

Date: 25 July 2025
Contact: Kyra Reid
Location: City Development
Telephone: 07 5582 8866
Your reference: 23-8110
Our reference: COM/2024/317

MG Land Pty Ltd
C/- Urban Strategies Pty Ltd – Emily Hines/Hayden
PO BOX 3368
SOUTH BRISBANE QLD 4101

Dear Sir/Madam

Further advice – Assessment Manager

(Given under section 35 of the Development Assessment Rules)

I refer to the application lodged by:

Applicant name: MG Land Pty Ltd
Applicant contact details: C/- Urban Strategies Pty Ltd
PO BOX 3368
SOUTH BRISBANE
QLD 4101

in relation to land/premises described as:

Street address: 202 Baileys Mountain Road, UPPER COOMERA QLD 4209
Real property description: Lot 58 SP191940, Lot 57 SP214370, Lot 183 RP156422

Council's Project Team

The assessment of this application will be undertaken by the following Council project team.

Assessment Manager Kyra Reid Planner (07) 5582 8730 kreid@goldcoast.qld.gov.au	Planning Coordinator Adam Morris Coordinator Planning Assessment (07) 5667 3856 asmorris@goldcoast.qld.gov.au	Transport Planning Melinda Plank Transport Engineer (07) 5582 9364 mplank@goldcoast.qld.gov.au
Specialist Engineering Michelle Comte Principal Stormwater and Flood Engineer (07) 5582 8970 mcomte@goldcoast.qld.gov.au	Subdivision Engineering David Crosswell Senior Civil Engineer 07 5582 9351 dcrosswell@goldcoast.qld.gov.au	

Council of the City of Gold Coast (Council) officers have reviewed the application for the premises described and provide further advice for your consideration and action where appropriate. Officers invite the applicant to discuss these matters to the extent they modify the development footprint to workshop acceptable outcomes.

Transport Assessment

1. Transport code

Revisions to the Colliers' Traffic Engineering assessment are required in order to demonstrate compliance with Performance outcome PO11, PO13 and PO16 of the Transport code, including:

- i. Colliers' Traffic Engineering assessment identifies that compliant 'entering' and 'exiting' Safe Intersection Sight Distance (SISD) is not achieved, in an easterly direction, for the proposed new intersection in Baileys Mountain Road. The commentary provided in the report does not justify non-compliant sight distances. Data (from multiple surveys) identifies 85th percentile speeds of (at least) 70km/h, signage does not overcome physical sight distance deficiencies and vegetation clearing is already considered within the assessment. Compliant SISD, as per Austroads requirements, must be demonstrated for the proposed intersection, particularly considering that this will be a new intersection, located in a greenfield site, and intended to provide access to the 'Courtney Drive Precinct'.
- ii. Clearly identify the total number of lots / dwellings that have been adopted as the 'ultimate' catchment for the design of the new intersection in Baileys Mountain Road. While page 3 of the Colliers report identifies a number of 'development' sites, current development proposals and approvals, the report doesn't identify which sites have been included in the 'ultimate' traffic catchment for the proposed intersection design. To be clear, the adopted traffic 'catchment' appears to consider only development proposals relating to current Council applications COM/2024/317 and (part of) ROL/2024/116; development yield for Lot 182RP156422 shall also be included in the 'catchment' for the intersection. The Traffic Engineering assessment shall be updated to include a table clearly identifying the specific lots, and the associated number of dwellings for each lot, adopted for the traffic 'catchment' that will use the proposed intersection.
- iii. Provide trip generation and trip distribution diagrams for 'catchment' traffic relating to the proposed new intersection in Baileys Mountain Road. Note – 'catchment' traffic shall relate to traffic volumes as identified in part (ii) (i.e. not limited to just the subject development's traffic).
- iv. Undertake revised turning warrants assessments (through to the 10-year design horizon) for the proposed new intersection in Baileys Mountain Road, based on the revised traffic 'catchment' identified in part (ii). Submit a revised 'functional layout' drawing to demonstrate any changes required to intersection design / configuration as a result.

Note: A BAR / AUL arrangement for the proposed intersection has not been endorsed for ROL/2024/116 (this is a current development application with Council, which is yet to be decided).

- v. Submit an updated swept path (using the 'design service vehicle') based on any amendments made to the intersection design / configuration.
- vi. Undertake revised SIDRA assessments for the proposed new access intersection in Baileys Mountain Road based on adoption of a growth rate of 5.5% p.a. (compounding), to 2036, as per Council's initial Information Request (rather than growth based on LGIP population estimates and growth, as adopted in the Traffic Engineering assessment).
- vii. Update the 'functional layout' drawing for the proposed new intersection in Baileys Mountain Road, ensuring that it demonstrates compliance with all relevant design standards, and includes full dimensions (including lane widths, verge widths, etc, in addition to the lane lengths shown).

Note: Give Way' line marking appears to be shown erroneously at the end of the BAL treatment; lot boundaries are not clearly identified (on both sides of all roads) to delineate

the road corridor; dimensions have not been provided to show compliant verge widths (there appears to be non-standard verge widths resulting from the proposed intersection design); etc.

- viii. Update the 'functional layout' drawing to clearly identify all land requirements, for the purpose of road. To be clear, land requirements shall be shown for each relevant component, including:
- To accommodate the proposed new intersection in Baileys Mountain Road.
 - To accommodate the proposed new public road (along northern site boundary).
 - To accommodate Council's planned upgrades to Baileys Mountain Road.

Land requirements for 'Council' works and 'development-related' works shall be clearly delineated (for example, colour-coded) to ensure that each land requirement, for each purpose, is clearly distinguished.

- ix. Ensure that 'development drawings' (MCU component) and the 'functional layout' drawing (for intersection / road works) are consistent.

2. Transport code

General – PO20

The NW parking aisle (containing two visitor parking spaces) still includes a non-compliant length as a 'blind' aisle (exceeds the equivalent length of 6 parking spaces, plus 1m, as per AS2890.1). Provision for turn-around must be made at the end of the visitor parking aisle, to comply with AS2890.1.

Subdivision Engineering

3. Public Road vehicle turning facility

Reconfiguring a lot code: Circulation and street access design – PO15 & PO16

Transport code: Roads and freight – PO11, PO12 & PO13

Vehicle turning facility

Officers acknowledge the Applicant's response to Item 25 of the Information Request, noting the view that as an interim arrangement until such time the public road network is completed through adjacent proposed development, the vehicle crossover of the proposed MCU development can facilitate 3-point vehicle turnaround movements, in lieu of a public road turning facility.

However, Officers do not consider the provision of a vehicle crossover (private infrastructure associated with the proposed MCU development) to be an appropriate facility for vehicles of the general public to complete a turnaround manoeuvre.

In addition, Officers consider that neither the Applicant nor Council could determine a definitive timeline for when the road network would be extended, hence in any case, the length of time such an interim turning arrangement would be in place is uncertain.

Section 2.4.15 of the City's Land Development Guidelines states that a facility for vehicles to turn around is provided at the end of all cul-de-sac streets (i.e. streets that are closed at one end). Therefore, Officers maintain the view that a vehicle turning facility is required to be provided at the Southern end of the proposed public road as previously requested. This is a typical and consistent approach by Council.

Land dedication / New road

Officers maintain that this is required to be amended to include additional proposed land dedication as new road to accommodate the requested vehicle turning facility and corner truncations at the proposed intersection on Bailey's Mountain Road, plus any additional land to accommodate the acceptable intersection functional layout (as required by Council's TAPM and

Transport Assessment sections).

Therefore, to address the above items the Applicant is requested to provide:

- i. An engineering concept road design drawing (fully dimensioned) showing a vehicle turning facility at the Southern end of the proposed public road. An 18m diameter (kerb to kerb) cul-de-sac head is an acceptable option, or alternatively a “T” shaped turning facility can be considered, subject to provision of RPEQ signed swept path drawings to demonstrate the largest intended design vehicle can safely and efficiently achieve a turnaround manoeuvre.
- ii. An amended ROL plan showing amended land dedication for the new public road to:
 - a. Accommodate the proposed vehicle turning facility, including minimum 4.5m wide verges around the full perimeter; and
 - b. Provide corner truncations at the proposed intersection location with Bailey's Mountain Road, made by 3 equal chords of a 6m radius plus any additional land to accommodate an acceptable intersection functional layout (as required by Council's TAPM and Transport Assessment sections comments for the proposed intersection).

Note: The vehicle turning facility is expected to be constructed similar to the City's minimum requirements for public road as per the City's Land Development Guidelines (ie. kerb and channel, asphalt surfacing, minimum 4.5m wide verges).

4. Indicative road network and new public road street classification

Reconfiguring a lot code: Circulation and street access design – PO15 & PO16

Transport code: Roads and freight – PO11

Indicative ultimate traffic volumes for proposed new public road

Officers acknowledge that in the Applicant's response to this item (Colliers report), the ultimate traffic catchment for the proposed public road appears to include development proposals relating to current Council applications COM/2024/317 and (part of) ROL/2024/116. However, Officers consider it is appropriate for the development yield for Lot 182RP156422 to also be included in the ultimate traffic catchment for the proposed public road.

Therefore, Officers request the Traffic Engineering assessment be updated to include a table clearly identifying the specific lots and the associated number of dwellings for each lot, adopted for the traffic 'catchment' that will use the proposed public road. It is anticipated that the amended Traffic Engineering assessment will provide an updated indicative ultimate traffic volume (in vehicles per day) for the proposed new public road within the subject site.

Earthworks plans for extension of public road

The Applicant's response did not include earthworks drawings to address this item.

Therefore, the Applicant is requested to provide concept bulk earthworks drawings to demonstrate the proposed new public road can be extended further South-West in the future. Demonstrate that the proposed earthworks and finished ground levels where the South-Western end of the proposed new public road meets adjoining lots does not create significant level differences (maximum 1m level difference) and hence, the proposal does not restrict the ability for this public road to be extended.

Hydraulics and Water Quality

5. Quality and quantity

- a. Retaining walls are generally not supported within stormwater management systems. The use of walls around most of the basin's perimeter may pose a public safety risk,

particularly given the proximity to the future park's pedestrian footpath. Please provide a public safety risk assessment within the Stormwater Management Plan, demonstrating how the design complies with Water by Design guidelines, the Landscape Design Guidelines (LDG), QUDM, and Performance outcome PO10 of the Healthy waters code.

- b. Amend the drawings “Concept Bio Basin Plan and Details” and “Concept Civil Works” to:
 - Clearly show the setback dimensions of the basin from all site boundaries
 - Label the recreational link and/or show it in a distinct colour, and clearly label the road to be dedicated.
- c. An easement in favour of the subject site is required over the private stormwater pipe located within Council's land, from the basin to the waterway. Please update the relevant drawings to clearly show the proposed easement extension.

6. Overland flow paths

A Hydraulic Assessment has been submitted; however, to ensure overland flow is safely conveyed and free surface flow is not obstructed, the following items must be addressed:

- a. The blockage scenario must account for a 50% blockage in accordance with LDG Section 4.4.25. Provide an assessment of stormwater impacts using a blockage factor consistent with QUDM and LDG. Demonstrate that public safety is maintained (e.g. maximum flow depth and depth–velocity product) for flows overtopping the road during a major storm event (If any) and confirm that no unacceptable impacts will occur to adjacent properties.
- b. Figure D2 (1%AEP Flood Level Difference Map – Sensitivity) shows external impacts exceeding 100mm, which is not acceptable under Council's Flood Model Noise Practice Note. Written consent from affected upstream property owners (Lot 183 on RP156422) must be provided to support this increase.
- c. Figures C2.1 to C2.7 show afflux exceeding acceptable limits upstream of the proposed culvert. Amend the design to reduce impacts or provide written consent from upstream landowners (Lot 183 on RP156422) accepting the increased flood levels.

7. Public safety

Retaining walls are not a preferred outcome for stormwater management systems. Demonstrate that the basin design complies with LDG and QUDM, particularly Section 4.5.14.12.2 (Co-location of stormwater treatment and stormwater detention), and address public safety risks in accordance with QUDM Section 5.12. The following is noted:

- a. The use of walls along most of the basin perimeter presents safety concerns, especially given its location adjacent to a pedestrian footpath in the future park. Exclusion fencing around detention/retention systems should be a last resort. Wherever possible, the design should prioritise minimising safety risks through appropriate basin layout and grading.
- b. Provide a public safety risk assessment within the Stormwater Management Plan according to requirements of Water by Design, LDG and QUDM, and demonstrate compliance PO10 of the code. The assessment must include consideration of risk mitigation measures in the event someone falls into the basin during a 1%AEP storm event.
- c. If applicable, suitable safety provisions such as fencing and warning signage should be provided.

8. Maintenance access

While a 2.5 m wide vehicle access to the bioretention basin is noted, it does not meet all maintenance requirements. In accordance with LDG Table 4.26, maintenance access must include:

- A path to more than 40% of the basin perimeter, with a minimum width of 0.75 m, for weed management and access to outlets;
- No vehicle access over the bioretention filter media surface.

The applicant is requested to demonstrate that maintenance access is provided to all stormwater management systems and appropriately considers:

- a. The type of vehicle or machinery required for maintenance activities; and
- b. The need to ensure a safe working environment for both maintenance personnel and the public.

Additionally, the applicant is required to provide access for maintenance of the proposed culverts (2/1.50x0.6) under the new road, including both inlet and outlet structures, as well as the associated drainage channel. The access must allow for vehicle entry.

- a. Extend the easement upstream of the proposed road (at the culvert inlet) in accordance with Section 4.4.5.3 of the LDG, with a minimum length of 5 metres. Update relevant drawings to confirm sufficient maintenance access.
- b. Dedicate the area marked as easement over the drainage channel and the outlet of the proposed culverts to Council, to facilitate ongoing maintenance.

Current Period

Notwithstanding the advice provided by the Council, assessment of your application will continue.

Please note - Any additional information provided by you during the development assessment process, is not required to be accepted by Council as assessment manager unless by agreement.

If you require additional time to consider the advice provided and any actions you may wish to take in response, you may wish to consider stopping a current period in the development assessment process in accordance with section 32 of the Development Assessment Rules.

Response format

As an electronically lodged application, please email all responses in PDF attachments (titled: 1 forms, 2 supporting documents, 3 plans and 4 specialist reports) to: mail@goldcoast.qld.gov.au. Do not password protect the PDF

Contacting us

Should you wish to clarify any issues contained in this letter, please do not hesitate to contact Planning Assessment on 07 5582 8866.

Yours faithfully



Adam Morris
Coordinator Planning Assessment (North)
For the Chief Executive Officer
Council of the City of Gold Coast