

SECTION 2: SUPPORTING DOCUMENTS



60 Dutton Street, Coolangatta

Information Request Response including –
Appendix A - Copy of Council's Information Request

The Applicant responds as follows:

Preamble

In response to Council's Information Request, the Applicant and consultant team has undertaken a comprehensive review of the design, including detailed consideration of planning, architectural, landscape, market conditions, project feasibility, and contextual matters.

As a result of this review, the proposal has been amended to reduce the overall building height which, while addressing various other project considerations, also addresses the matters raised by Council in relation to building height, scale, and character. The amended proposal includes the following key change:

- Reduction in building height from 10 storeys (33.15m) to 9 storeys (29.65m); and
- Reduction in apartment yield from 9 to 8 apartments.

This amendment reduces the overall height uplift sought above the mapped Code assessable building height of 23 metres from 44.13% to just 28.91% (6.65 metres above the mapped height), substantially narrowing the extent of variation.

The amended design improves built form compatibility with surrounding development and integrates with the existing and emerging mid-rise character of the southern Coolangatta area including unifying the scale and intensity transition from the coastal strip to medium and lower intensity character to the south. Notwithstanding, the proposal still delivers a high-quality apartment product in accordance with the City Plan's intent for compact urban neighbourhoods, while also aligning with the 'up-lift' criteria contained Specific Outcome 3.3.2.1(9)(b) of the Strategic Framework. In this regard, a Character Assessment has been provided to demonstrate how the development reinforces local identity and sense of place.

In addition to the above various other amendments have been undertaken to address the matters raised, including improving the interface with adjoining properties, Dutton Street, and Goodwin Park, through varied setbacks, increased landscaping, additional architectural features. Technical matters such as hydraulic and waste provisions have also been addressed.

Responses to the Information Request items follow.

Response to Information Request

TOWN PLANNING / ARCHITECTURE ASSESSMENT

1. Character Analysis

Specific outcome 3.3.2.1(9)(b) – Strategic Framework

The proposed development consists of a 9-storey (33.15m) residential apartment building located on a 703m² site in the Medium density residential zone with a Code assessable building height designation of 23m. The proposed development is therefore seeking to utilize the building height uplift provisions prescribed in specific outcome 3.3.2.1(9) of the Strategic Framework.

Specific outcome 3.3.2.1(9)(b) requires development to ‘Reinforce local identity and sense of place’, when seeking the uplift provisions for development above the Code height designation. City officers acknowledge that taller buildings above the mapped building height are approved within the broader Coolangatta local area, however are concerned that no similar scale developments are within proximity of the subject site. The surrounding development character and scale predominantly consists of built form ranging from 1 – 3 storeys. Given the scale and intensity of the proposal within this established character, the proposed development may result in an overbearing appearance that is incongruent with surrounding built form character, especially with consideration to the proposed 44.13% increase above the mapped height.

The Strategic Framework terms “local identity” and “sense of place” are broad concepts not defined within the City Plan. It is considered that the above concepts are not just experienced from a static viewpoint and are also experienced by moving through an area being cognisant of existing and envisaged built form outcomes as significant contributors to each. In order to enable an accurate assessment of the proposal against the Strategic framework - Urban neighbourhood Elements: Specific outcome 3.3.2.1 (9)(b), City officers request the following:

- a. The applicant is requested to define the local area used to determine local identity and sense of place.*
- b. Submit a character analysis of the local area that analyses the established and envisioned development, including any new developments constructed or approved above the mapped height designation, to demonstrate the proposal meets the above specific outcome.*

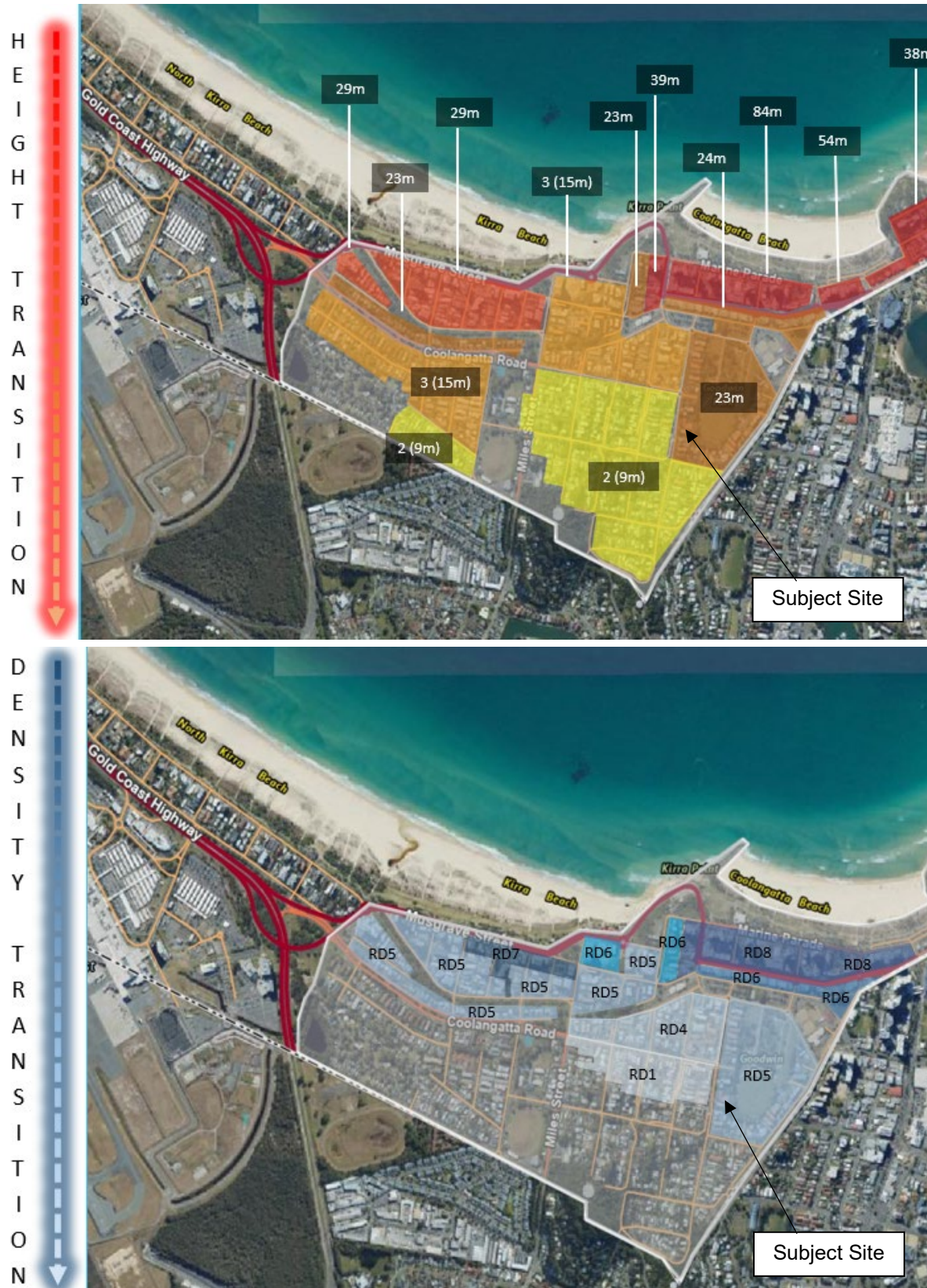
Note: Council officers are agreeable to liaising with the applicant regarding what constitutes the local area before undertaking the requested character analysis. If it cannot be demonstrated that the development effectively reinforces local identity and sense of place, reductions to building height may be required.

RESPONSE: Consideration of the ‘local area’ as relevant to the site and proposal, and with particular regard to the intention of the City Plan (and previous planning schemes) in terms of locational attributes, zoning, residential density, and building height provisions is reflected in the accompanying **Coolangatta Character Assessment** contained in **Section 4 – Specialist Reports**. An overview of assessment is provided below.

Defining the Local Area

For the purposes of the character assessment, the local area is defined as the general Coolangatta region with a narrowing focus to the area broadly surrounding Goodwin Park. Consideration of the general Coolangatta area is necessary in order to demonstrate the deliberate intention of the City Plan

for a 'transition' from higher scale and intensity along the coastal spine / beachfront and Coolangatta centre to a reduced scale and intensity to the south comprising suburban zoning, and lower building heights and residential density.



In this regard the assessment found that the area in between the higher intensity coastal area and lower intensity suburban area to the south, is a transition area of which properties adjoining Goodwin Park including the subject site form a key part. These areas incorporate the Medium density residential zone, with mid-rise building heights, and medium density provisions, and capture an evolving urban character influenced by recent development trends in line with the City Plan provisions.

While it is recognised that currently the area on the west and south of Goodwin Park is dominated by 1-3 storey buildings, it nonetheless must also be recognised that areas evolve over time typically guided by the parameters of planning schemes, including aspects such as the 'uplift' provisions which are provided in specific circumstances and subject to the compliance with the relevant criteria.

Character Analysis and Justification

The submitted character assessment identifies a clear built form evolution in the local area, including several recently approved or constructed developments that exceed the mapped 23m height provisions as shown below –



These approvals are located within the same zone, and height and density provisions and confirm an emerging mid-rise character within the local precinct, consistent with the City Plan's intention to support increased residential intensity and compact urban form in well-served locations.

The proposed development at 9 storeys (29.65m) aligns with this transition and sits comfortably within the identified mid-rise band. This is further supported by:

- Proximity to community infrastructure and services (e.g., direct access to Goodwin Park, close to The Strand, Kirra Hill Cultural Centre. Coolangatta beach, etc.); and
- A broader context that includes several buildings exceeding the 23m height designation, namely to the north and northeast.

The proposal reinforces local identity by contributing to the transition scale and intensity away from the coast, and realising opportunities for increased height and density focussed around Goodwin Park. The proposal offers contemporary architecture, passive surveillance, and an appropriate landscaped interface with the street and park. It responds suitably to the intended height transitions, as is reinforced in the Character Analysis and in context of the properties immediately adjacent Goodwin Park.

Conclusion

The proposed mid-rise development at 60 Dutton Street:

- Accords with the evolving character of the area as evidenced by the intentions for the area and approved built form above the Code assessable building height provisions;
- Contributes positively to the emerging urban fabric and residential density anticipated by the Strategic Framework; and
- Reinforces local identity and sense of place through a context-appropriate scale, design articulation, and integration with Goodwin Park and nearby mid-rise developments.

As such, the development is considered to satisfy Specific Outcome 3.3.2.1(9)(b) of the City Plan.



The Applicant confirms that they have adequately responded to this item

2. Setbacks and site cover

Specific outcome 3.3.2.1(9)(c) – Strategic Framework & PO1 & PO2 – Medium density residential zone code

City officers are concerned that the proposed development provides an intense appearance that adversely impacts on character and amenity due to the reduced setbacks proposed to the side boundaries. The proposed setbacks of typically 3m to wall with reduced setbacks for planters, wet areas and vertical circulation which range between 2.3m – 2.5m are more commensurate to setbacks provided for developments under a 23m height designation.

In addition, City officers are concerned that the proposed high site cover of the lower levels is not sufficiently balanced with landscaping where the proposed car aisle dominates this side of the property, minimal landscaping has been introduced to assist in softening the buildings visual bulk or to reduce visibility into car parking under croft areas.

Therefore, proposal in its current form is not considered to provide a well-managed interface with, relationship to and impact to adjoining development, assist in the protection of adjacent amenity and provide a sufficient balance of built and green form. To demonstrate compliance with Strategic framework - Urban neighbourhood Elements: Specific outcomes 3.3.2.1 (b), (c)

and (e), in addition to PO1 and PO2 of the Medium density residential zone, the following is requested.

- a. *Provide increase setbacks to the towers side elevations to achieve predominately 3.5m to the wall to apartment facades (including wet areas).*
- b. *Provide increase setbacks to the lift core, stairwell, or any service area to a minimum 3m from the southern boundary.*
- c. *Introduce landscaping along the northern boundary.*
- d. *Where items, a, b and c cannot be achieved to the above parameters, City officers recommend reducing the building height, in accordance with Item 1 above.*

Advice note: Although the proposed building design parameters are not considered to achieve the required design parameters for (9)(b)(c) of the Urban Neighbourhood Elements - Strategic Framework 3.3.2.1, City officers consider that the proposal may meet code assessable setback requirements with less changes should the building be lowered in height. City officers are willing to provide further commentary should this approach be undertaken.

RESPONSE: Each of the items 'a' to 'd' are addressed below –

- a. Providing side setbacks of predominantly 3.5m on this 14m wide site would result in a building width of 7m which would significantly compromise the quality and functionality of the apartment product. Notwithstanding, design revisions have occurred to achieve 3m setbacks in both sides of the tower.

3m setbacks are sufficient in the context of adjoining development and the high quality built form. Adjoining the development to the north is a single storey dwelling, and to the south is a 2 storey duplex development. Given the low-rise nature of the adjoining developments building separation is only relevant to the ground and first floor levels, which is sufficient in this case. With regard to other matters such as shadowing, privacy, etc. the proposed 29.65m high building would not have noticeably greater impacts than a 23m high code assessable building.

In terms of future development opportunities for the adjoining properties were similar setbacks (e.g. 3m) imposed then building separation of 6m would be achieved which would be an appropriate outcome in the context of a medium density residential zoned site.

- b. The setback between the lift core / stairwell and the southern boundary has been increased to 3m as requested.
- c. While we understand officers' request for landscaping along the northern boundary, stormwater infrastructure traverses the entire length of the northern boundary from Dutton Street to Goodwin Park; and the area is protected by a 2.74m wide easement. This easement was the key consideration when determining a suitable development footprint. The adjoining driveway width is designed to the minimum standard width of 6.1m to allow ingress and egress into the car parking spaces. As a combination of these two matters, any meaningful landscaping in this location is not possible. Notwithstanding, were landscaping provided in this location it would have limited value and potential poor vitality given its location adjacent to the fence and driveway.
- d. As outlined in the preamble, unrelated to the above requests, the proposed building has been reduced in height from 10 storeys to 9 storeys.



The Applicant confirms that they have adequately responded to this item

3. Building appearance and street edge

Specific outcome 3.3.2.1(9)(e) – Strategic Framework

While City officers acknowledge that the medium rise building present as visually interesting appearance, officers consider that the overall tower appearance and proposed street edge does not deliver an excellent standard of appearance as prescribed in specific outcome 3.3.2.1(9)(e). In addition, an excellent standard of appearance should be achieved with regards to an improved landscaping outcome, this is identified in relevant landscaping items in this Information Request. Therefore, the following improvements are suggested for the design of the proposed development:

- a. Significantly improve the street edge arrangement to achieve a more open, inviting and landscaped address and interface to the street edge.*
- b. Introduce higher quality materials to the ground floor and level 2 podium.*
- c. Introduce higher quality slab edge detailing to the tower.*
- d. Introduce textured soffits to balconies.*
- e. Introduce higher quality façade finishes for the tower. City officers consider feature materials should be provided for the lift and stair well vertical elements, in addition to amending the light beige infill walls to elevate the architectural appearance.*
- f. Provide further variation to the developments roof cap to support contrast and distinction. Officers consider this may be achieved through the roof edge and soffit detailing, including variation in materials/colours to the tower below.*

ADVICE NOTE: Although the proposed building design parameters and overall composition is not considered to achieve the required design requirements of the Urban Neighbourhood Elements - Strategic Framework Specific Outcome 3.3.2.1(9)(e), City officers consider that the proposal may meet code assessable design and appearance outcomes with less changes should the building be lowered in height. City officers are willing to provide further commentary should this approach be undertaken.

RESPONSE: Each of the items 'a' to 'f' are addressed below –

- a. Noting the physical and practical constraints that exist within the frontage of apartment building due to provisional and location requirements for above ground water metres, fire boosters, vehicle crossovers, separate pedestrian access, visitor car and bicycle parking, basement car parking, etc. which limit opportunities for substantive 'deep' landscaping in the context of a feasible development, the project team have revisited the frontage design to consolidate and increase landscaping opportunities where possible.
- b. In general, a coastal white colour palette has been adapted to more closely reflect and compliment contemporary built form palettes in the area. Matt white aluminium louvres and centrally located screen battens have been added to the level 2 podium to improve visual interest and screening while promoting a slender form.
- c. Slab edges comprises a white-rendered finish which integrate with the broader colour palette.

- d. The inclusion of textured soffits to balconies was not deemed necessary, given the reduction in building height and the already high-quality architectural design. The proposed soffits are intentionally light in colour and appearance and visually unobtrusive.
- e. As noted above, the colour palette has been amended to white coastal theme consistent with contemporary design in coastal locations. While feature materials are not proposed to the lift shaft / stairwell both of these vertical elements have been integrated into the overall built form and are generally indistinguishable with the exception of the lift overrun.
- f. Subtle changes to the top level including the roof cap are shown on the Amended Plans. This includes variation to the rendered finish of the top level walls to distinguish the top level from the remaining parts of the tower while maintaining a cohesive design.



The Applicant confirms that they have adequately responded to this item

4. Privacy

Specific outcome 3.3.2.1(9)(b) – Strategic Framework & PO13 – High-rise accommodation code

Officers are concerned the proposal does not achieve a sufficient level of privacy between existing development, particularly where habitable windows are orientated towards side boundaries and will provide direct view lines to adjacent properties. In order to meet PO13 of the High rise accommodation design code and Urban Neighbourhood Elements - Strategic framework 3.3.2.1: Specific outcomes (9)(c) where the proposal supports a well-managed interface through a sufficient level of privacy between developments, it is requested that further privacy treatment is incorporated, or further information is provided to demonstrate how privacy is achieved. Privacy treatment should contribute positively to the overall architectural language and contribute to an excellent standard of appearance.

RESPONSE: Given that the building has been reduced to below 33m, the Multiple accommodation code applies in lieu of the High-rise accommodation code. Notwithstanding, both codes include provisions relating to amenity and privacy.

Given the height of the proposed building (8 storeys) and the existing adjoining buildings (1-2 storeys), the potential for privacy concerns from direct lines of sight are most relevant to the lower levels of the building given that visibility reduces as building height increases due to the increased physical distance to the adjoining buildings and associated private open space areas.

To mitigate identified privacy concerns, the Amended Plans, provided in **Section 3 – Plans** of this submission, now include screening by way of louvres on the second level.



The Applicant confirms that they have adequately responded to this item

5. Car parking undercroft

PO7 – General development provisions code

The proposal includes an on-grade “open undercroft” type car parking area on the ground level. Council officers are concerned this undercroft will impact on the northern adjoining residential property. Further, it is likely that under-slab services and lighting (below the Level 2 slab) would be highly visible from adjoining residential properties, resulting in nuisance and visual amenity impacts.

To ensure the proposal addresses outcomes within Urban Neighbourhood Elements - Strategic framework 3.3.2.1: Specific outcomes (9)(c) and PO2 and PO7 of the General development provisions code, it is requested that the visibility of the underside of the Level 2 slab is mitigated in order to prevent nuisance from car park lighting as well as to screen under slab services (plumbing pipe penetrations etc.), protect adjoining residential visual amenity, in addition to preventing a stark or austere appearance.

RESPONSE: Amended Plans are provided in **Section 3 – Plans** of this submission whereby a rendered concrete barrier has been introduced to the underside of the car park ceiling to screen services and minimise light spill from the car park. The barrier integrates with the overall design of the building while mitigating impacts on amenity.



The Applicant confirms that they have adequately responded to this item

6. Additional Information

City officers are concerned that the proposal contains insufficient information to enable proper assessment, the following is therefore requested:

- a. Provide an overall building height taken from natural ground level.*
- b. Provide higher quality 3D perspective of the development which include clearer images of the side elevations. Officers consider perspectives taken at a less obscure angle will be sufficient.*
- c. Provide a full material, colours and finishes palette. City officers note that the façade identifies varied finishes to the painted render walls, however details of proposed texture such as vertical lines within the elevations are omitted within the submitted architectural documentation.*
- d. Provide clarification of the proposed screening, including size and spacings of battens.*
- e. The supporting material provided assessment against the Multiple accommodation code which is applicable for building height up to 32m. The proposal seeks a building height of 33.15m. If this building height is to be achieved, assessment against the high-rise accommodation code of the City Plan is to be provided.*

RESPONSE: Amended Plans are provided in **Section 3 – Plans** of this submission which address items 'a' to 'd' as follows –

- a. An overall building height taken from natural ground level of 29.65 metres is provided in the Amended Plans.
- b. Additional 3D perspectives including that of the side elevations are provided in Amended Plans.
- c. The Amended Plans included the requested additional information.
- d. Batten sizing and spacing is now indicated on the 'Colour Palette' in the Amended Plans.

With regard to Item 'e', the proposed building height has been amended to 29.65m, and therefore the *Multiple accommodation code* now applies.



The Applicant confirms that they have adequately responded to this item

7. Building Structure Advice Note

The proposal provides a unique structural arrangement, where the northern part of the tower is cantilevered over a proposed easement which runs the length of the northern boundary. While a cantilevered structural design is not unachievable, the proposal includes typical column widths between car parking bays which may be required to be amended to meet structural design requirements and could impact the ground floor and car parking layouts. Therefore, City officers recommend the applicant seek preliminary structural advice to ensure that any response submitted to Council ensures the proposed ground floor layout and structural design is feasible and does not impact the design and operation of the ground level.

RESPONSE: The design of the structure has been informed on advice from a qualified structural engineer, as well as other qualified consultants such as architects and traffic engineers. The advice based on the preliminary design of the dwelling is that the structure including column widths are sufficient.



The Applicant confirms that they have adequately responded to this item

LANDSCAPE / OPEN SPACE ASSESSMENT

8. Amended Drawings and Statement of Landscape Intent

Specific outcome 3.3.2.1(9)(e) & PO1 & PO2 – Medium density residential zone

The reduced setbacks and the high site coverage result a lack of greenery and no tree planting opportunity at street level. The landscaping adjoining neighbouring properties is also very limited, especially to the north. Overall, there is a noticeable absence of trees and greenery at street level. In its current form, the proposal does not demonstrate a sufficient balance between built form and landscaping.

Officers emphasise the importance of achieving a high-quality landscape interface with the streetscape and neighbouring properties to assist in achieving compliance with Performance PO1 and PO2 of the Medium density residential zone code and Strategic Framework 3.3.2.1 Specific outcome point (9) (e) regarding 'an excellent standard of appearance of the built form and street edge'.

To enhance the landscape interface along the boundaries and support compliance with the relevant benchmarks, the applicant is requested to improve the landscaping, especially along the frontage to achieve a better overall landscape outcome along the street.

The applicant is requested to provide the following design changes:

- a. Provide a deep planting area along the frontage to accommodate one tree. To support tree planting, a minimum garden area of 6m² is requested to be provided and the tree is requested to be located to maintain a minimum of 3m separation from the building line.*
- b. Provide landscaping along the northern boundary that will be visible from the adjoining property.*

RESPONSE: As noted, in the response to Item 3, there are challenging physical and practical constraints that exist within the frontage of an apartment building design (e.g. above ground water metres, fire boosters, vehicle crossovers, separate pedestrian access, visitor car and bicycle parking, basement car parking, etc.) which limit opportunities for substantive 'deep' landscaping in the context of a feasible development. That said, the design has been further resolved to better balance these requirement with landscaping.

In direct response to item 'a', a deep planting area measuring in excess of 6m² and with 3m separation to the building line is now proposed.

With regard to Item 'b' as noted elsewhere in this response, the provision of meaningful landscaping along the northern boundary is significantly constrained due to the underground infrastructure and easement which extends along the entirety of this boundary. Were any landscaping possible, it is our view that its overall impact would be negligible at best given it would be a very narrow landscape bed located between the fence and driveway.

To offset landscaping along the northern boundary, podium and tower planters are proposed which are able to make a more substantiative contribution to softening the built form and balancing hard and soft elements to integrate with the landscaped nature of the area.



The Applicant confirms that they have adequately responded to this item

HYDRAULIC ASSESSMENT

9. Stormwater Easement

PO10 – General development provisions code

The Services Layout Plan drawing #G24095-DA03, Revision 01 shows an assumed stormwater/drainage easement over the existing 1200 X 900 RCBC within the property. No stormwater/drainage easement exists according to Council property records. As such, the Applicant is requested to amend the drawing, nominating a stormwater/drainage easement in favour of Council in accordance with QUDM (2017) Section 3.12.4 Drainage easement dimensions in compliance with PO10 above.

The applicant may remove the "Assumed Stormwater Easement" and replace with "Proposed Stormwater Easement" amending the plan in accordance with the above.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project civil engineers, Michael Bale and Associates, as well as an Amended Stormwater Management Plan and Engineering Services Report.



The Applicant confirms that they have adequately responded to this item

10. Plan of proposed internal stormwater network

PO3 – Healthy waters code

It is unclear how surface stormwater from Catchment 4 (Driveway) are conveyed to the treatment tank. No plan supports the claim that surface stormwaters are conveyed to the treatment tank for final treatment by the Atlan filters. As such, the applicant is to provide a plan of the proposed internal stormwater network for Catchment 4 in connection to the treatment tank reflecting the

submitted MUSIC model OR amend the MUSIC model with the Catchment 4-Driveway as entirely bypass updating any results in compliance with PO3 above.

The applicant may provide an Atlan FlowGuard at the end and across the driveway treating stormwater before discharge to the lawful point of discharge amending the MUSIC model accordingly updating any results in accordance with the above.

Please provide an electronic copy of the amended MUSIC model for Council records.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project civil engineers, Michael Bale and Associates, as well as an Amended Stormwater Management Plan and Engineering Services Report.



The Applicant confirms that they have adequately responded to this item

11. Amended Services layout plan

PO5 – Healthy waters code

It is unclear how surface stormwater from Catchment 4 (Driveway) is conveyed to the detention tank. No plan supports the claim that surface stormwaters are conveyed to the detention tank. As such, the applicant is to provide an amended Services Layout Plan drawing #G24095-DA03, Revision 01 of the proposed internal stormwater clearly demonstrating Catchment 4 in connection to the detention tank reflecting the submitted DRAINS model OR amend the DRAINS model with the Catchment 4-Driveway as entirely bypass updating any results in compliance with PO5 above.

The Applicant may provide a trench grate at the end and across the driveway diverting stormwater to the detention tank before discharge to the lawful point of discharge, amending the DRAINS model accordingly and updating any results in accordance with the above.

Please provide an electronic copy of the amended DRAINS model for Council records.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project civil engineers, Michael Bale and Associates, as well as an Amended Stormwater Management Plan and Engineering Services Report.



The Applicant confirms that they have adequately responded to this item

12. Lawful point of discharge

PO6 – Healthy waters code

Council will not accept the proposed lawful point of discharge. The proposed lawful point of discharge is within Goodwin Park which is State controlled land. Stormwater discharge to State controlled land cannot be permitted unless consent is granted by the State authority. As such, the applicant is required to amend the Services Layout Plan drawing #G24095-DA03, Revision 01 demonstrating a lawful point of discharge in accordance with City Plan Policy SC6.11 Land development guidelines 4.4.5 (Downstream drainage requirements).

The applicant may connect to the existing 1200 X 900mm RCBC (reinforced concrete box culvert) running through the property at the northern property determined to be a lawful point of discharge.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project civil engineers, Michael Bale and Associates, as well as an Amended Stormwater Management Plan and Engineering Services Report.



The Applicant confirms that they have adequately responded to this item

13. Overland flow paths and Stormwater drainage

PO7 – Healthy waters code & PO10 – General development provisions code

The proposed residential dwellings will increase and extend hardstand area over the subject site, which is anticipated to alter existing stormwater overland flow arrangement.

It is noted that given the proposed minor drainage infrastructure (based on the minor drainage system service standard for RD5 residential zoning will have an approximate 10% AEP capacity, therefore for events larger than the 10% AEP (up to and including the 1% AEP) it is anticipated that flow from the western catchment flows will still 'overflow' towards the rear boundary.

Peak discharge across the rear of the property boundary is anticipated increase with runoff from the western catchment and the lot in its entirety may impact on peak flood flow rate, peak flood velocity and peak flood levels of the existing case considering the proposed development is within an identified overland flow path.

Based on the above, the applicant is requested to submit an updated stormwater management plan to address the issues below:

- a. The site is subject to an upstream external catchment to the south and a larger external upstream to the west. Provide detailed information for management of external catchments flows through the subject site during post developed condition to ensure no adverse impact external to the subject site.*
- b. Demonstrate that the ground floor level driveway and garage entrances (hardstand) and other internal ground structures (retaining wall, garages, foyer, waste area, stairs etc) does not have any adverse impact external to the subject site and do not significantly alter the overland flow path extent for storm events up to the 1% AEP.*
- c. Demonstrate that there is no worsening of the overland flow extent because of the development.*
- d. Include a drainage layout plan identifying external catchments and runoff directions pre and post development.*

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project civil engineers, Michael Bale and Associates, as well as an Amended Stormwater Management Plan and Engineering Services Report.



The Applicant confirms that they have adequately responded to this item

WATER AND WASTE

14. Waste chute system

PO1 – Solid waste management code

Performance outcome PO1 of the City Plan ‘Solid Waste Management Code’ requires that the development provides waste and recycling storage facilities that are appropriate and adequate for the type and volume of waste generated by providing amended plans clearly depicting the location of the waste chute on each level, hoppers and separate waste storage room detailing all relevant dimensions.

Development with dwellings above the third storey must include an appropriate waste removal system which incorporates waste chutes, hoppers and a separate waste storage room consistent with section 17 of the ‘City Plan Policy – Solid Waste Management’. The development plan (DA10.01 – DA10.08) indicates that this type of waste removal system is not provided. Amended plans are therefore required to be submitted detailing the provision of this system consistent with Council Policy.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project waste consultant, Geleon.



The Applicant confirms that they have adequately responded to this item

15. Bulk bins required to service development

PO4 – Solid waste management code

Performance outcome PO4 of the ‘Solid Waste Management Code’ requires that waste and recycling servicing points are appropriately located and designed to facilitate safe, unobstructed and efficient servicing of waste containers by providing amended plans detailing all relevant dimensions.

Assessment of the submitted information / plans has identified that provision of wheelie bins shall not be a safer outcome given the height of the proposed development. The development must therefore be serviced by a bulk bin service for general and recyclable waste.

Additional information is requested to be submitted, detailing the location of all proposed bulk bin storage and servicing points. The design and construction of all points must comply with sections 13 and 14 of the ‘City Plan Policy – Solid Waste Management’.

RESPONSE: Please refer to **Section 4 – Specialist Reports** of this submission which includes a written response from the project waste consultant, Geleon.



The Applicant confirms that they have adequately responded to this item

Conclusion

In accordance with Section 13.2(a) of the Development Assessment Rules, this information request response addresses all of the information requested by Council and will enable the Development Application to proceed to the Public Notification Stage.

Appendix A. Copy of Council's Information Request dated 19 June 2025

Date: 19 June 2025
Contact: Luke Caldwell
Location: City Development
Telephone: 5582 9357
Your reference: 2024-12-722
Our reference: COM/2025/157

Southern Cross Property Holdings Pty Ltd
C/- Enhance Urban Planning
PO BOX 7143
SOUTHPORT PARK QLD 4215

Dear Sir/Madam

Information Request

I refer to the development application lodged by:
Southern Cross Property Holdings Pty Ltd

in relation to development of land/premises described as:
Lot 2 RP86756 – 60 Dutton Street, COOLANGATTA QLD 4225

Council of the City of Gold Coast (Council) officers have reviewed the development application and supporting information and determined that further information is required to properly assess the application.

Pursuant to sections 13.2 and 13.3 of the Development Assessment Rules under the *Planning Act 2016*, the applicant may respond to this information request by giving to the assessing authority:

- 1 all of the information requested below; or
- 2 part of the information requested below; or
- 3 part of the information requested below together with a notice advising the assessing authority that it must proceed with the assessment of the application; or
- 4 a notice stating that none of the information requested below will be provided; or
- 5 a notice stating that none of the information requested below will be provided together with a notice advising the assessing authority that it must proceed with the assessment of the application.

You are advised that pursuant to section 13.1 of the Development Assessment Rules, the period for the applicant to respond to this information request is three (3) months of the date of this letter.

If no response is provided or only part of the information is provided to this request within the three (3) month period, Council will continue its assessment of the application based on the information submitted.

It would be in the applicant's best interest to address all of the information requested.

Please note that the provision of sufficient information to properly assess an application is a requirement for a favourable decision.

Council's Project Team

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

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INFORMATION REQUEST

Town Planning / Architecture Assessment

1. Character Analysis

Specific outcome 3.3.2.1(9)(b) – Strategic Framework

The proposed development consists of a 9-storey (33.15m) residential apartment building located on a 703m² site in the Medium density residential zone with a Code assessable building height designation of 23m. The proposed development is therefore seeking to utilize the building height uplift provisions prescribed in specific outcome 3.3.2.1(9) of the Strategic Framework.

Specific outcome 3.3.2.1(9)(b) requires development to 'Reinforce local identity and sense of place', when seeking the uplift provisions for development above the Code height designation. City officers acknowledge that taller buildings above the mapped building height are approved within the broader Coolangatta local area, however are concerned that no similar scale developments are within proximity of the subject site. The surrounding development character and scale predominantly consists of built form ranging from 1 – 3 storeys. Given the scale and intensity of the proposal within this established character, the proposed development may result in an overbearing appearance that is incongruent with surrounding built form character, especially with consideration to the proposed 44.13% increase above the mapped height.

The Strategic Framework terms “local identity” and “sense of place” are broad concepts not defined within the City Plan. It is considered that the above concepts are not just experienced from a static viewpoint and are also experienced by moving through an area being cognisant of existing and envisaged built form outcomes as significant contributors to each. In order to enable an accurate assessment of the proposal against the Strategic framework - Urban neighbourhood Elements: Specific outcome 3.3.2.1 (9)(b), City officers request the following:

- a. The applicant is requested to define the local area used to determine local identity and sense of place.
- b. Submit a character analysis of the local area that analyses the established and envisioned development, including any new developments constructed or approved above the mapped height designation, to demonstrate the proposal meets the above specific outcome.

Note: Council officers are agreeable to liaising with the applicant regarding what constitutes the local area before undertaking the requested character analysis. If it cannot be demonstrated that the development effectively reinforces local identity and sense of place, reductions to building height may be required.

2. Setbacks and site cover

Specific outcome 3.3.2.1(9)(c) – Strategic Framework & PO1 & PO2 – Medium density residential zone code

City officers are concerned that the proposed development provides an intense appearance that adversely impacts on character and amenity due to the reduced setbacks proposed to the side boundaries. The proposed setbacks of typically 3m to wall with reduced setbacks for planters, wet areas and vertical circulation which range between 2.3m –2.5m are more commensurate to setbacks provided for developments under a 23m height designation.

In addition, City officers are concerned that the proposed high site cover of the lower levels is not sufficiently balanced with landscaping where the proposed car aisle dominates this side of the property, minimal landscaping has been introduced to assist in softening the buildings visual bulk or to reduce visibility into car parking undercroft areas.

Therefore, proposal in its current form is not considered to provide a well-managed interface with, relationship to and impact to adjoining development, assist in the protection of adjacent amenity and provide a sufficient balance of built and green form. To demonstrate compliance with Strategic framework - Urban neighbourhood Elements: Specific outcomes 3.3.2.1 (b), (c) and (e), in addition to PO1 and PO2 of the Medium density residential zone, the following is requested.

- a. Provide increase setbacks to the towers side elevations to achieve predominately 3.5m to the wall to apartment facades (including wet areas).
- b. Provide increase setbacks to the lift core, stairwell, or any service area to a minimum 3m from the southern boundary.
- c. Introduce landscaping along the northern boundary.
- d. Where items, a, b and c cannot be achieved to the above parameters, City officers recommend reducing the building height, in accordance with Item 1 above.

Advice note: Although the proposed building design parameters are not considered to achieve the required design parameters for (9)(b)(c) of the Urban Neighbourhood Elements - Strategic Framework 3.3.2.1, City officers consider that the proposal may meet code assessable setback requirements with less changes should the building be lowered in height. City officers are willing to provide further commentary should this approach be undertaken.

3. Building appearance and street edge

Specific outcome 3.3.2.1(9)(e) – Strategic Framework

While City officers acknowledge that the medium rise building present as visually interesting appearance, officers consider that the overall tower appearance and proposed street edge does not deliver an excellent standard of appearance as prescribed in specific outcome 3.3.2.1(9)(e). In addition, an excellent standard of appearance should be achieved with regards to an improved landscaping outcome, this is identified in relevant landscaping items in this Information Request. Therefore, the following improvements are suggested for the design of the proposed development:

- a. Significantly improve the street edge arrangement to achieve a more open, inviting and landscaped address and interface to the street edge.
- b. Introduce higher quality materials to the ground floor and level 2 podium.
- c. Introduce higher quality slab edge detailing to the tower.
- d. Introduce textured soffits to balconies.
- e. Introduce higher quality façade finishes for the tower. City officers consider feature materials should be provided for the lift and stair well vertical elements, in addition to amending the light beige infill walls to elevate the architectural appearance.
- f. Provide further variation to the developments roof cap to support contrast and distinction. Officers consider this may be achieved through the roof edge and soffit detailing, including variation in materials/colours to the tower below.

ADVICE NOTE: Although the proposed building design parameters and overall composition is not considered to achieve the required design requirements of the Urban Neighbourhood Elements - Strategic Framework Specific Outcome 3.3.2.1(9)(e), City officers consider that the proposal may meet code assessable design and appearance outcomes with less changes should the building be lowered in height. City officers are willing to provide further commentary should this approach be undertaken.

4. Privacy

Specific outcome 3.3.2.1(9)(b) – Strategic Framework & PO13 – High-rise accommodation code

Officers are concerned the proposal does not achieve a sufficient level of privacy between existing development, particularly where habitable windows are orientated towards side boundaries and will provide direct view lines to adjacent properties. In order to meet PO13 of the High rise accommodation design code and Urban Neighbourhood Elements - Strategic framework 3.3.2.1: Specific outcomes (9)(c) where the proposal supports a well-managed interface through a sufficient level of privacy between developments, it is requested that further privacy treatment is incorporated, or further information is provided to demonstrate how privacy is achieved. Privacy treatment should contribute positively to the overall architectural language and contribute to an excellent standard of appearance.

5. Car parking undercroft

PO7 – General development provisions code

The proposal includes an on-grade “open undercroft” type car parking area on the ground level. Council officers are concerned this undercroft will impact on the northern adjoining residential property. Further, it is likely that under-slab services and lighting (below the Level 2 slab) would be highly visible from adjoining residential properties, resulting in nuisance and visual amenity impacts.

To ensure the proposal addresses outcomes within Urban Neighbourhood Elements - Strategic framework 3.3.2.1: Specific outcomes (9)(c) and PO2 and PO7 of the General development provisions code, it is requested that the visibility of the underside of the Level 2 slab is mitigated in order to prevent nuisance from car park lighting as well as to screen under slab services (plumbing pipe penetrations etc.), protect adjoining residential visual amenity, in addition to preventing a stark or austere appearance.

6. Additional Information

City officers are concerned that the proposal contains insufficient information to enable proper assessment, the following is therefore requested:

- a. Provide an overall building height taken from natural ground level.
- b. Provide higher quality 3D perspective of the development which include clearer images of the side elevations. Officers consider perspectives taken at a less obscure angle will be sufficient.
- c. Provide a full material, colours and finishes palette. City officers note that the façade identifies varied finishes to the painted render walls, however details of proposed texture such as vertical lines within the elevations are omitted within the submitted architectural documentation.
- d. Provide clarification of the proposed screening, including size and spacings of battens.
- e. The supporting material provided assessment against the Multiple accommodation code which is applicable for building height up to 32m. The proposal seeks a building height of 33.15m. If this building height is to be achieved, assessment against the high-rise accommodation code of the City Plan is to be provided.

7. Building Structure Advice Note

The proposal provides a unique structural arrangement, where the northern part of the tower is cantilevered over a proposed easement which runs the length of the northern boundary. While a cantilevered structural design is not unachievable, the proposal includes typical column widths between car parking bays which may be required to be amended to meet structural design requirements and could impact the ground floor and car parking layouts. Therefore, City officers recommend the applicant seek preliminary structural advice to ensure that any response submitted to Council ensures the proposed ground floor layout and structural design is feasible and does not impact the design and operation of the ground level.

Landscape / Open Space Assessment

8. Amended Drawings and Statement of Landscape Intent

Specific outcome 3.3.2.1(9)(e) & PO1 & PO2 – Medium density residential zone

The reduced setbacks and the high site coverage result a lack of greenery and no tree planting opportunity at street level. The landscaping adjoining neighbouring properties is also very limited, especially to the north. Overall, there is a noticeable absence of trees and greenery at street level. In its current form, the proposal does not demonstrate a sufficient balance between built form and landscaping.

Officers emphasise the importance of achieving a high-quality landscape interface with the streetscape and neighbouring properties to assist in achieving compliance with Performance PO1 and PO2 of the Medium density residential zone code and Strategic Framework 3.3.2.1 Specific outcome point (9) (e) regarding '*an excellent standard of appearance of the built form and street edge*'.

To enhance the landscape interface along the boundaries and support compliance with the relevant benchmarks, the applicant is requested to improve the landscaping, especially along the frontage to achieve a better overall landscape outcome along the street.

The applicant is requested to provide the following design changes:

- a. Provide a deep planting area along the frontage to accommodate one tree. To support tree planting, a minimum garden area of 6m² is requested to be provided and the tree is requested to be located to maintain a minimum of 3m separation from the building line.
- b. Provide landscaping along the northern boundary that will be visible from the adjoining property.

Hydraulic Assessment

9. Stormwater Easement

PO10 – General development provisions code

The Services Layout Plan drawing #G24095-DA03, Revision 01 shows an assumed stormwater/drainage easement over the existing 1200 X 900 RCBC within the property. No stormwater/drainage easement exists according to Council property records. As such, the Applicant is requested to amend the drawing, nominating a stormwater/drainage easement in favour of Council in accordance with QUDM (2017) Section 3.12.4 Drainage easement dimensions in compliance with PO10 above.

The applicant may remove the "Assumed Stormwater Easement" and replace with "Proposed Stormwater Easement" amending the plan in accordance with the above.

10. Plan of proposed internal stormwater network

PO3 – Healthy waters code

It is unclear how surface stormwater from Catchment 4 (Driveway) are conveyed to the treatment tank. No plan supports the claim that surface stormwaters are conveyed to the treatment tank for final treatment by the Atlan filters. As such, the applicant is to provide a plan of the proposed internal stormwater network for Catchment 4 in connection to the treatment tank reflecting the submitted MUSIC model OR amend the MUSIC model with the Catchment 4-Driveway as entirely bypass updating any results in compliance with PO3 above.

The applicant may provide an Atlan FlowGuard at the end and across the driveway treating stormwater before discharge to the lawful point of discharge amending the MUSIC model accordingly updating any results in accordance with the above

Please provide an electronic copy of the amended MUSIC model for Council records.

11. Amended Services layout plan

PO5 – Healthy waters code

It is unclear how surface stormwater from Catchment 4 (Driveway) is conveyed to the detention tank. No plan supports the claim that surface stormwaters are conveyed to the detention tank. As such, the applicant is to provide an amended Services Layout Plan drawing #G24095-DA03, Revision 01 of the proposed internal stormwater clearly demonstrating Catchment 4 in connection to the detention tank reflecting the submitted DRAINS model OR amend the DRAINS model with the Catchment 4-Driveway as entirely bypass updating any results in compliance with PO5 above.

The Applicant may provide a trench grate at the end and across the driveway diverting stormwater to the detention tank before discharge to the lawful point of discharge, amending the DRAINS model accordingly and updating any results in accordance with the above.

Please provide an electronic copy of the amended DRAINS model for Council records.

12. Lawful point of discharge

PO6 – Healthy waters code

Council will not accept the proposed lawful point of discharge. The proposed lawful point of discharge is within Goodwin Park which is State controlled land. Stormwater discharge to State controlled land cannot be permitted unless consent is granted by the State authority. As such, the applicant is required to amend the Services Layout Plan drawing #G24095-DA03, Revision 01 demonstrating a lawful point of discharge in accordance with City Plan Policy SC6.11 Land development guidelines 4.4.5 (Downstream drainage requirements).

The applicant may connect to the existing 1200 X 900mm RCBC (reinforced concrete box culvert) running through the property at the northern property determined to be a lawful point of discharge.

13. Overland flow paths and Stormwater drainage

PO7 – Healthy waters code & PO10 – General development provisions code

The proposed residential dwellings will increase and extend hardstand area over the subject site, which is anticipated to alter existing stormwater overland flow arrangement.

It is noted that given the proposed minor drainage infrastructure (based on the minor drainage system service standard for RD5 residential zoning will have an approximate 10% AEP capacity, therefore for events larger than the 10% AEP (up to and including the 1% AEP) it is anticipated that flow from the western catchment flows will still 'overflow' towards the rear boundary.

Peak discharge across the rear of the property boundary is anticipated increase with runoff from the western catchment and the lot in its entirety may impact on peak flood flow rate, peak flood velocity and peak flood levels of the existing case considering the proposed development is within an identified overland flow path.

Based on the above, the applicant is requested to submit an updated stormwater management

plan to address the issues below:

- a. The site is subject to an upstream external catchment to the south and a larger external upstream to the west. Provide detailed information for management of external catchments flows through the subject site during post developed condition to ensure no adverse impact external to the subject site.
- b. Demonstrate that the ground floor level driveway and garage entrances (hardstand) and other internal ground structures (retaining wall, garages, foyer, waste area, stairs etc) does not have any adverse impact external to the subject site and do not significantly alter the overland flow path extent for storm events up to the 1% AEP.
- c. Demonstrate that there is no worsening of the overland flow extent because of the development.
- d. Include a drainage layout plan identifying external catchments and runoff directions pre and post development.

Water and Waste

14. Waste chute system

PO1 – Solid waste management code

Performance outcome PO1 of the City Plan '*Solid Waste Management Code*' requires that the development provides waste and recycling storage facilities that are appropriate and adequate for the type and volume of waste generated by providing amended plans clearly depicting the location of the waste chute on each level, hoppers and separate waste storage room detailing all relevant dimensions.

Development with dwellings above the third storey must include an appropriate waste removal system which incorporates waste chutes, hoppers and a separate waste storage room consistent with section 17 of the '*City Plan Policy – Solid Waste Management*'. The development plan (DA10.01 – DA10.08) indicates that this type of waste removal system is not provided. Amended plans are therefore required to be submitted detailing the provision of this system consistent with Council Policy.

15. Bulk bins required to service development

PO4 – Solid waste management code

Performance outcome PO4 of the '*Solid Waste Management Code*' requires that waste and recycling servicing points are appropriately located and designed to facilitate safe, unobstructed and efficient servicing of waste containers by providing amended plans detailing all relevant dimensions.

Assessment of the submitted information / plans has identified that provision of wheelie bins shall not be a safer outcome given the height of the proposed development. The development must therefore be serviced by a bulk bin service for general and recyclable waste.

Additional information is requested to be submitted, detailing the location of all proposed bulk bin storage and servicing points. The design and construction of all points must comply with sections 13 and 14 of the '*City Plan Policy – Solid Waste Management*'.

Advice Note

The applicant is advised that should Council give further advice about the application (in accordance with s35 of the DA Rules) to resolve outstanding items not adequately addressed within the information request response, the applicant will be requested to complete a 'Notice to Stop the Current Period' for the above-mentioned application until the items within the further advice are adequately addressed. Alternatively, the applicant may choose to provide a reasonable extension to the Decision period, as advised by the Assessment manager. If the applicant does not stop the Current Period or provide a reasonable extension to the Decision period, Council officers will proceed with assessing and deciding the application based on the information provided in the information request response, which could result in an unfavourable recommendation by Council officers.

Notice to Stop the Current Period Form:

<https://dsdmipprd.blob.core.windows.net/general/Applicanttemplate9.0-Noticeaboutstoppingthecurrentperiod.doc>

DA Rules extract:

s35.1 An assessment manager or concurrence agency for the application may, at any time before the application is decided, give further advice about the application to the applicant.

s35.2 Further advice may include advice about how the applicant may change the application.

Response format

As this application was lodged electronically, please direct all future correspondence regarding this application in the required PDF format i.e.:

- **Supporting documents** (separate the supporting documents into individual PDF appendices)
- **Plans** (combine as one single PDF)
- **Specialist reports** (separate each specialist report into individual PDF appendices)

Do not password protect the PDF.

The electronic response should be forwarded to mail@goldcoast.qld.gov.au with the Assessment Manager Luke Caldwell copied into the email LCALDWELL@goldcoast.qld.gov.au.

Please note, all development applications are publicly viewable on the Council's City of Gold Coast's PD Online: cityofgoldcoast.com.au/pdonline.

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

A handwritten signature in black ink, appearing to be 'AB' or similar initials, written in a cursive style.

Adam Brown
Coordinator Planning South
For the Chief Executive Officer
Council of the City of Gold Coast