TOWN PLANNING REPORT

DEVELOPMENT PERMIT FOR RECONFIGURING A LOT

1 INTO 18 LOTS

98 GLENMORE DRIVE, BONOGIN, 4213

LOT 1 ON RP218875

MARCH 2026

Urban Planning | Urban Design
Project Management | Development Advice



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Application Overview

Site and Application Details	
Address	98 Glenmore Drive, Bonogin
Lot and Plan	Lot 1 on RP218875
Site Area	124,000m^2
Local Authority	City of Gold Coast Council
Local Authority Zoning	Rural residential zone
Application Details	Reconfiguring a lot – 1 into 18
Level of Assessment	Impact assessment
Referral Agencies	SARA
Applicant Details	Salt Development Projects C/- HPC Planning Level 4, Central Tower One, 56 Scarborough Street, Southport, QLD 4215 Contact: Thomas Stubbs Phone: (07) 3101 4157 Emai: Thomas.s@hpcplanning.com.au
Land Owner	Jennifer Lee Shultz

Table 1: Site and Application Details

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1 Introduction

1.1 Overview

HPC Planning (HPC) have been engaged by Salt Development Projects ("**the Applicant**") to prepare and lodge a development application seeking a Development Permit for Reconfiguring a lot for 1 into 18 lots at 98 Glenmore Drive, Bonogin, properly described as Lot 1 on RP218875 (the '**subject site**').

Under the City Plan, Version 13, (the '**City Plan**') the subject site is included within the Rural residential zone. In accordance with Table 5.6.1: Reconfiguring a lot of the City Plan, the proposed development is subject to Impact assessment due to exceeding the average lot size threshold.

The proposed development has been considered in respect of all applicable Codes including the Rural residential zone code and the Strategic framework of the City Plan and is considered to satisfy the relevant benchmarks applicable to the development.

Our assessment, set out within this report, also finds that the proposed development is consistent with the statutory requirements of the Planning Act 2016 and the associated Planning Regulation 2017. Applicable State Development Assessment Provisions are also satisfactorily addressed herein.

1.2 Recommendation

This independent town planning report, coupled with the supporting specialist reports, demonstrates that the proposed development is an appropriate outcome for the site, generally accords with the relevant provisions of the rural residential zone and will not prejudice the development potential of adjoining lots. As such, the application is recommended for approval, subject to reasonable and relevant conditions.

1.3 Supporting Information

Independent specialist studies have been prepared to ensure that all applicable matters are evaluated and addressed as part of this application. This town planning report should be read in conjunction and considered with the following supporting documentation outlined in Table 2.

Consultant	Discipline
Legend Consultants	Plans / Engineering / Stormwater
AH Survey	Survey Plans
Dune St	Landscape Plans
Ultimate Planning Solutions	Ecological Consultants
Queensland Bushfire Risk Assessment	Bushfire Consultant
Country-Wide Water	Effluent Engineers

Table 2: Supporting Specialist Information

The preparation of the studies was an iterative process with the results and recommendations shaping the design of the development proposed. All relevant supporting information has been provided for the development application to be considered Properly Made.

1.4 Appendices

Appendix	Report	Consultant
A	Plans	Legend Consultants
B	Statement of Landscape Intent	Dune St
C	Topographical Survey	AH Survey
D	Engineering Report	Legend Consultants
E	Stormwater Management Plan	
F	Bulk Earthworks Plan	
G	Ecological Assessment	Ultimate Planning Solutions
H	Rehabilitation Management Plan	
I	Bushfire Management Assessment	Queensland Bushfire Risk Assessment
J	Wastewater Design	
K	Site & Soil Wastewater Evaluation Report	Country-Wide Water
L	DA Form 1	HPC Planning
M	Landowners Consent	

Table 3: Appendix

1.5 Legislative Framework

A summary of the site and development parameters are outlined in Table 1 below.

Site and Application Details	
RP DESCRIPTION	Lot 1 on RP218875
ADDRESS	98 Glenmore Drive, Bonogin
SITE AREA	124,000m^2

LOCAL AUTHORITY	City of Gold Coast Council
LOCAL AUTHORITY ZONING	Rural residential zone
APPLICATION DETAILS	Reconfiguring a lot – 1 into 18
LEVEL OF ASSESSMENT	Impact assessment
APPLICABLE OVERLAY CODES	• Airport environs overlay • Bushfire hazard overlay • Dwelling house overlay • Environmental significance overlay • Flood overlay • Landslide hazard overlay
REFERRAL AGENCIES	Not applicable

Table 4: Site and Application Details

2 Site and Surrounding Development

2.1 Property Description

The subject site is located at 98 Glenmore Drive, Bonogin, properly described as Lot 1 on RP218875. The site consists of a large Rural residential zoned allotment of 124,000m^2. The site is described as sloping from west to east, significantly vegetated and improved by two Dwelling houses and associated structures. Access to the site is achieved via vehicle crossover fronting Glenmore Drive

Figure 1 below shows the context of the site in relation to the surrounding area, while **Figure 2** shows the zoning of the land.



Figure 1: Aerial view of the subject site



Figure 2: City Plan zone map

2.2 Surrounding Development

The subject site forms part of the suburb of Bonogin and is positioned within a well-established and historically subdivided area of Rural residential zoned allotments, improved by single Dwelling houses and associated structures. The built form within the area is stately, consisting of larger houses, pools, tennis courts and ornamental landscaping.

To determine the average lot size within the immediate area of the subject site, a review of the allotments shown in yellow below has been undertaken where it has determined:

- A total of 86 allotments zoned within the Rural residential zone
- A total area of 534,116m^2
- An average lot size of 6,210m^2

When considering the figures above to the proposed development, the proposed average lot size exceeds the surrounding average lot size by 678m^2 and therefore is considered to maintain a development outcome in keeping with the anticipated character of the area, despite any non-compliance with the Reconfiguring a lot thresholds outlined within the City Plan.

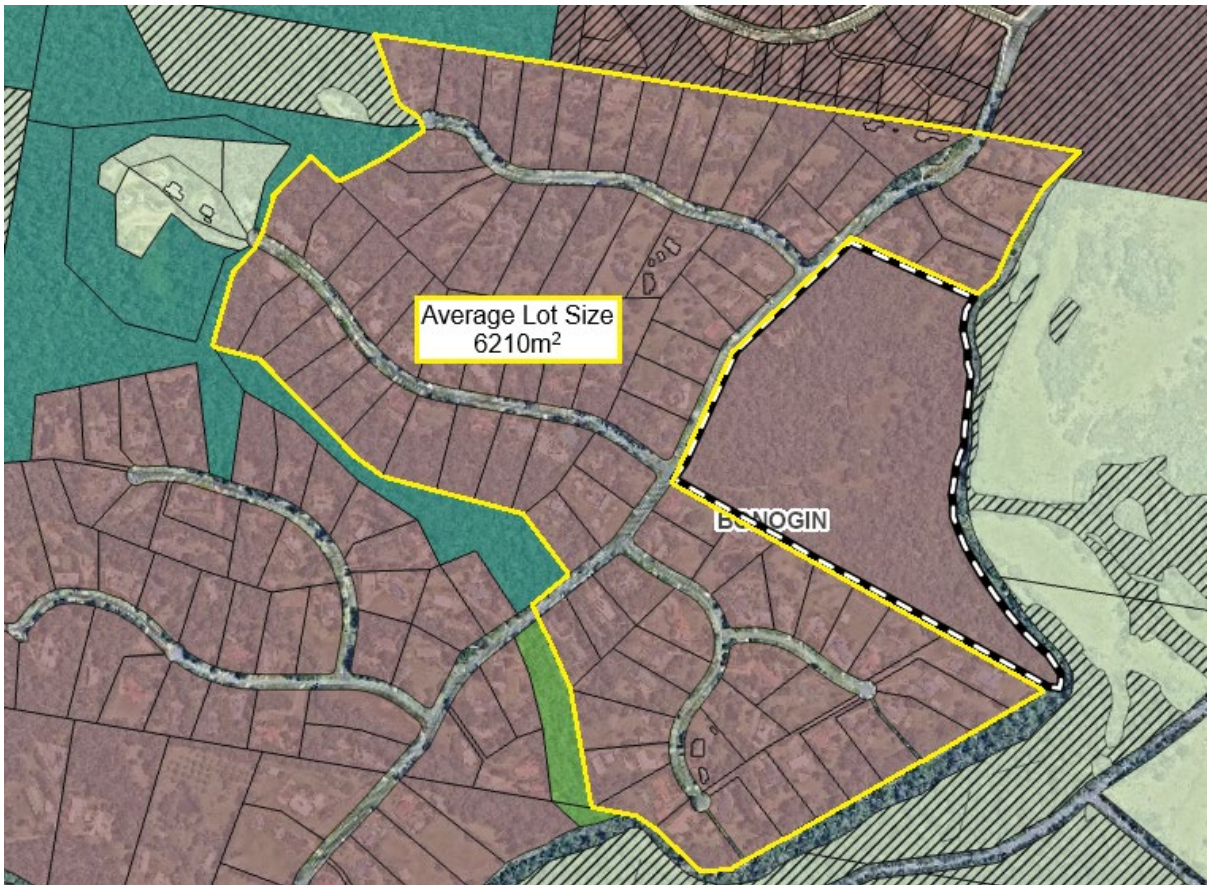


Figure 3: Catchment area and average lot size

2.3 Easements

No easements currently burden or benefit the subject site.

2.4 Urban Infrastructure

Details regarding urban infrastructure is provided below. For full details, please refer to the Engineering Infrastructure Report, prepared by Legend Consultants, located within **Appendix D.**

Stormwater management	• On lot detention tanks (5kL) discharging to proposed public bio basin.
Sewer	• on site effluent treatment within each lot
Water	• Connection via the existing 300mm ductile iron water main opposite verge of Glenmore Drive to connect Lots 8 through 18. • Lot 1 through 7 will have property connections directly off the existing main in Glenmore Drive.

Table 5: Infrastructure

2.5 Significant Vegetation

The site features mature vegetation scattered throughout the site and includes mapped State matters of environmental significance described as follows:

Mapping	Overlay
• **Regulated vegetation management map (Category A and B extract)** • **Core koala habitat area**	

Table 6: DAMS

Given the abovementioned overlays, and as the development proposes to clear regulated vegetation and koala habitat areas, referral to the Chief Executive is required.

2.6 Site History

There are no relevant historic or current development applications recorded against the subject site.

3 Proposed Development

3.1 Proposal Overview

This application seeks a Development Permit for Reconfiguring a lot for 1 into 18 lots at 98 Glenmore Drive, Bonogin. The proposed development seeks to subdivide a large portion of Rural residential zoned land to facilitate 18 freehold allotments, new internal cul-de-sac road and bio-basin. The subdivision will result in 7 allotments fronting Glenmore Drive while all other allotments will gain access via the new proposed internal road.

Due to both the environmental values and topography of the site, the proposed allotments will provide designated building envelopes, allowing for flat building pads for future dwellings, associated structures and effluent disposal systems (including LAA areas). The balance of proposed Lots 1-7 and Lots 12-18 will be dedicated to an environmental covenant with batter work and retaining walls anticipated for slope stability. The environmental covenant will include rehabilitation work, boundary clearing restrictions and on-going maintenance.

The proposed development results in a practical subdivision of land, cognisant of environmental and topographical constraints and maintains the existing and anticipated character of the area.

A summary of key development attributes is detailed in the table below:

Number of lots	18 allotments	
Average lot size	6,888m^2	
Access	**Lots**	**Access**
	Proposed Lots 1-7	Glenmore Drive
	Proposed Lots 8-18	New Road
Servicing	**Water**	Connection to water main within Glenmore Drive
	Sewer	On-site effluent disposal system for each allotment
Retaining walls	**Retaining wall height**	**Lot affected**
	7m	Side boundary of proposed Lot 7 and 18
	1.5m	Rear and side boundary of proposed Lots 5-7, 12 and 16-17
Environmental considerations	• 44% of the site dedicated to environmental protection via covenant • 64% of mapped koala habitat protected and rehabilitated • Retention of mapped waterway and riparian vegetation • Extensive buffer zones to mapped waterways	
Stormwater management	On lot detention tanks discharging to proposed bio basin.	
Sewer	on site effluent treatment within each lot	

Table 7: Development data

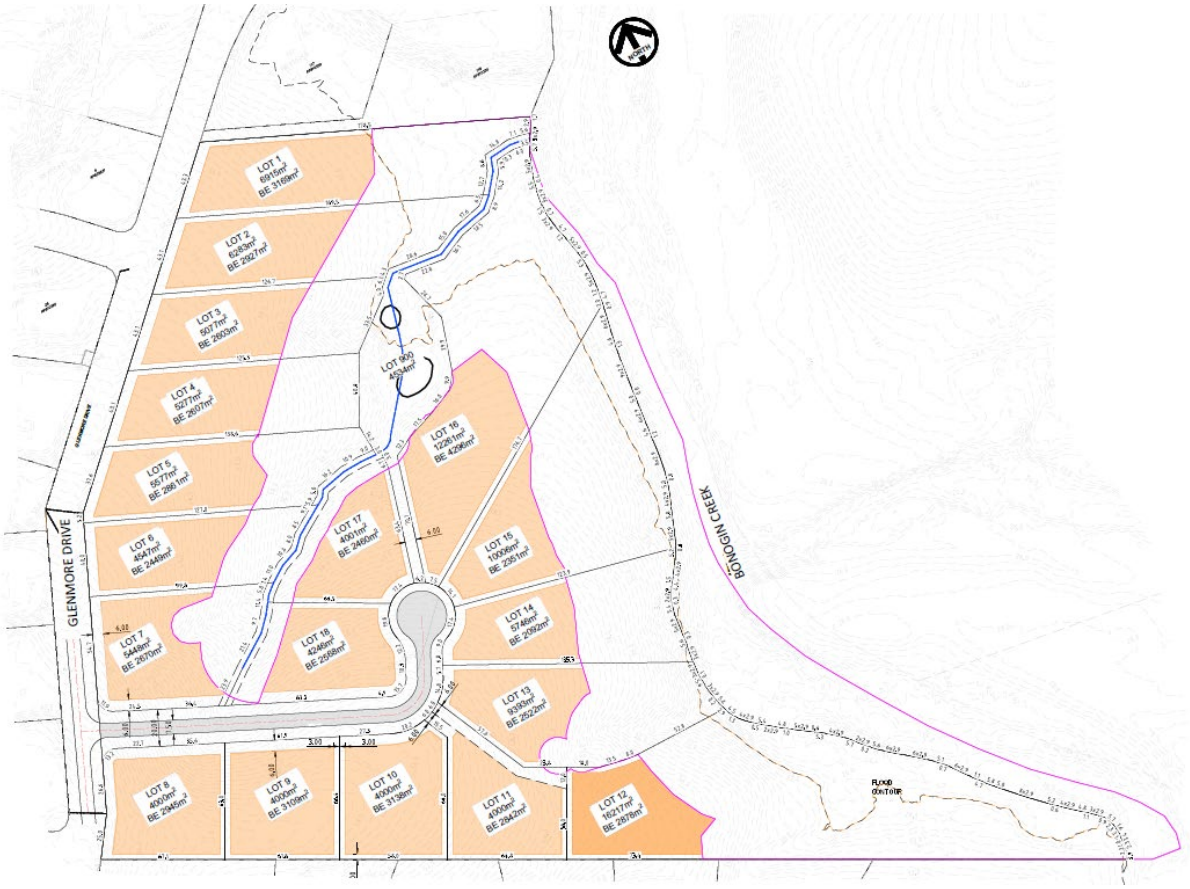


Figure 4: Proposed reconfiguring of lot layout plan

4 State Assessment Framework

This section of the report explains the applicable components of the statutory town planning framework and its relevance to the proposed development.

4.1 Planning Act 2016

The *Planning Act 2016* ("the Act") is the governing piece of legislation that regulates development within Queensland. The Act seeks to provide for an efficient, effective, transparent, integrated, coordinated and accountable system of land use planning and development assessment to facilitate the achievement of ecological sustainability. Chapter 3 of the Act and the *Development Assessment Rules 2017* set the framework and processes for integrating State and Local Government development assessment. Relevant parts of the Act are addressed below, including referral agency assessment and public notification, are addressed below.

4.2 Categories of Development

Section 44(3) of the Act prescribes that a development approval is required to carry out assessable development, as declared under the categorising instrument. In this instance, an Impact Assessment development application is required to be made to the assessment manager to acquire the necessary development approvals.

4.3 Public Notification

According to Section 53 of the Act, public notification is required for a development application which is subject to Impact Assessment or includes a variation request. As the development application requires Impact Assessment, public notification is required to be conducted in accordance with Part 4 of the Development Assessment Rules 2017, for fifteen (15) business days.

4.4 Referral Agencies

Under the Act and *Planning Regulation 2017* (the Regulation) various components of development applications trigger referral of the application to external Referral Agencies. Section 56 of the Act prescribes the powers granted to referral agencies, which include the ability to request additional information and to direct the assessment manager to approve development, impose conditions, or refuse the application. The Regulation identifies where a referral agencies assessment powers are limited to the provision of advice only.

The Department of State Development, Infrastructure and Planning is the single lodgement and assessment point for all applications where the state has jurisdiction under the Act and the Regulation.

Referral triggers have been mapped using the Development Assessment Mapping System (DAMS), which includes SARA mapping, as depicted in Figure 5 below. As per the SARA mapping system, the site is subject to the following matters of interest:

SEQ Regional Plan Triggers – Urban Footprint;

Water Resources – Water resource planning area; and

Koala Habitat Area – Core koala habitat area.

Native vegetation clearing – Regulated vegetation management map Category A and B extract



Figure 5: SARA mapping

Schedule 10 of the Regulation identifies where development requires referral agency assessment under the Act. Assessment against Schedule 10 confirms that the following referral triggers apply to this development application:

Referral trigger	Referral
Assessable development—clearing native vegetation on prescribed land *Development application for reconfiguring a lot that is assessable development under section 21, if—* *(a) a lot that the application relates to is 5ha or larger; and* *(b) the size of any lot created is 25ha or less; and* *(c) either—* *(i) the reconfiguration involves operational work that is assessable development under section 5, other than operational work that is only the clearing of regulated regrowth vegetation; or* (ii) *on any lot created, accepted operational work, other than operational work that is only the clearing of regulated regrowth vegetation, may be carried out*	The chief executive
Development interfering with koala habitat in koala habitat areas outside koala priority areas	The chief executive

Referral trigger	Referral
Development is assessable development to the extent the development involves interfering with koala habitat in an area that— *(a) is a koala habitat area; but* *(b) is not a koala priority area*	

Table 8: Schedule 10 referral triggers

4.5 State Development Assessment Provisions

The State Development Assessment Provisions (SDAP) provide assessment benchmarks for development applications requiring referral to the chief executive (SARA). This development application requires referral to the chief executive (SARA) as per section 4.4 above.

4.6 State Planning Policy

The State Planning Policy (SPP), adopted on 3 July 2017, is a State planning instrument made by the Minister under section 10 of the Act. The SPP defines the Queensland Government's policies about matters of state interest in land use planning and development. The State Planning Policy (SPP) is a key component of Queensland's land use planning system, which enables development, protects the natural environment and allows communities to grow and prosper.

Pursuant to section 26 of the Regulation, an assessment manager must have regard to the SPP to the extent that part E of the SPP is not adequately reflected in the planning scheme. The SPP is identified as being appropriately reflected within the *Planning Scheme* apart from the following:

- Natural hazards, risk and resilience (coastal hazards).

The subject site is not affected by the above overlay, as such no further assessment is required.

4.7 ShapingSEQ (South East Queensland Regional Plan 2023)

The South-East Queensland (SEQ) Regional Plan 2023, also known as *ShapingSEQ*, is the pre-eminent strategic land use plan for the region and provides a framework to manage growth, change, land use and development in SEQ. As demonstrated in Table 7 below, the proposed development is consistent with the goals, elements and strategies of the SEQ Regional Plan.

SEQRP relevant part	Compliance
Chapter 3, Part A: Goals, elements and strategies	Chapter 3, Part A contains five goals for the region, of which Goal 1: Grow is applicable to the proposed development. The proposal supports achieving Outcome 1-5 by providing an efficient use of Rural residential zoned land to provide additional allotments for future housing within the Bonogin area.
Chapter 3, Part B: Regional Growth Pattern	The subject site is located within the Urban Footprint of the regional plan. The proposed use is of an urban nature and subsequently is appropriate within the Urban Footprint.
Chapter 3, Part C: Sub-regional directions	The development is located in the Southern sub-region with the proposed development appropriately located within an existing rural residential area with proposed allotments commensurate with the surrounding area.

Table 9: ShapingSEQ assessment

5 Local Assessment Framework

5.1 Gold Coast City Plan Version 13

The Gold Coast City Plan Version 13 ("**Planning Scheme**") is the relevant local planning instrument for assessing this development application. The following sections of the town planning report evaluate the proposed development against the relevant provisions of the Planning Scheme.

5.2 Development Definition

The proposed development seeks to establish a residential subdivision. In accordance with Schedule 1 of the Planning Scheme, a Transport depot is defined as:

Reconfiguring a lot means—

(a) ***creating lots by subdividing another lot****; or*

(b) *amalgamating 2 or more lots; or*

(c) *rearranging the boundaries of a lot by registering a plan of subdivision under the Land Act or Land Title Act; or*

(d) *dividing land into parts by agreement rendering different parts of a lot immediately available for separate disposition or separate occupation, other than by an agreement that is—*

(i) *a lease for a term, including renewal options, not exceeding 10 years; or*

(ii) *an agreement for the exclusive use of part of the common property for a community titles scheme under the Body Corporate and Community Management Act 1997; or*

(e) *creating an easement giving access to a lot from a constructed road*

5.3 Categories of Assessment

In accordance with Table 5.6.1: Reconfiguring a lot of the City Plan, Version 13, the proposed development is subject to Impact assessment due to not meeting the average lot size threshold.

5.4 Strategic Framework

This strategic framework sets the policy direction for the City Plan and has a planning horizon of 2031. Conceptual mapping, showing land designations, supports the Strategic framework and is utilised to guide development outcomes in keeping with the applicable themes.

In accordance with the Strategic framework map 2 – settlement pattern, the subject site is identified within the 'Townships' designation identified below.

With consideration to the abovementioned mapping designation, the applicable themes and elements of the Strategic framework relevant to the proposed development are identified as follows:

Theme	Related Element
Creating liveable places	• Rural residential areas
Living with nature	• Green space network
A safe, well designed city	• Landscape character

Table 10: Strategic framework Themes and Elements

The proposed development seeks to facilitate a residential subdivision within the Rural residential zone. Due to the development proposing allotment sizes that do not meet the average lot size designation as stated within the City Plan, assessment of the proposed development against the Strategic framework has been focused on the development's ability to meet the reasonable character and amenity

expectations for a subdivision occurring within the Rural residential zone. In addition to the above, it is noted the site has various matters of environmental significance; as such, further assessment against the relevant environmental considerations stated within the Strategic framework of the City Plan has also been undertaken.

These themes and related benchmarks as stated within the Strategic framework are discussed in detail below.

Character and amenity

Theme	Element	Benchmark
Creating liveable places	Rural residential areas	***3.3.7.1*** *(1) Rural residential areas continue to support the lifestyle and amenity aspirations of residents in a semi-rural or bushland environment on very low intensity lots. They are not part of the urban area.* *(2) Rural residential areas protect and enhance bushland, waterways and wetlands, habitat trees and wildlife corridors. They help maintain the city's green frame, particularly on the Hinterland ranges and foothills. These areas may be subject to private conservation agreements.* *(3) Rural residential areas maintain their amenity and very low intensity and low-rise living environment. Subdivision is limited to existing rural residential areas. Development does not disrupt local amenity and character. Sustainable eco-villages may be appropriate where landscape character and ecological values are maintained.* *(4) Rural residential areas within the inter-urban break maintain and enhance non-urban landscape values, particularly by limiting subdivision and the clearing of vegetation.*

Table 11: Strategic framework benchmarks

The Strategic framework benchmarks outlined within the table above seek to protect the semi-rural, bushland character from over intensification of development, recognising the importance of the natural environment in contributing to the city's scenic amenity and protecting the lifestyle aspirations of residents.

With regard to the intent as stated above, the proposed development seeks to subdivide a large portion of Rural residential zoned land, to facilitate 18 freehold allotments, new internal cul-de-sac road and bio-basin. The subdivision will result in 7 allotments fronting Glenmore Drive with the minimum lot frontage being 37.6m. All other allotments will gain vehicle access via the proposed internal road. Due to both the environmental values and topography of the site, the proposed allotments will provide designated building envelopes, allowing for flat building pads for future dwellings, associated structures and effluent disposal systems (including LAA areas). The balance of proposed Lots 1-7 and Lots 12-18 will be dedicated to an environmental covenant with minor batter work anticipated for slope stability. The environmental covenant will include rehabilitation work, boundary clearing restrictions and on-going maintenance as discussed within the section below.

As noted throughout this report, the development results in Impact assessment as the average lot size is less than 8,000m^2, however the minimum lot size allowable within the zone (being 4,000m^2), is maintained. When considering the proposed development within the context of the Strategic framework benchmarks relating to *'supporting the lifestyle and amenity aspirations of residents*' and '*development does not disrupt local amenity and character'*, a character analysis has been undertaken within the

immediate catchment area in order to determine the appropriateness of the proposed lot sizes. The analysis area and average lot size is demonstrated in the figure below.

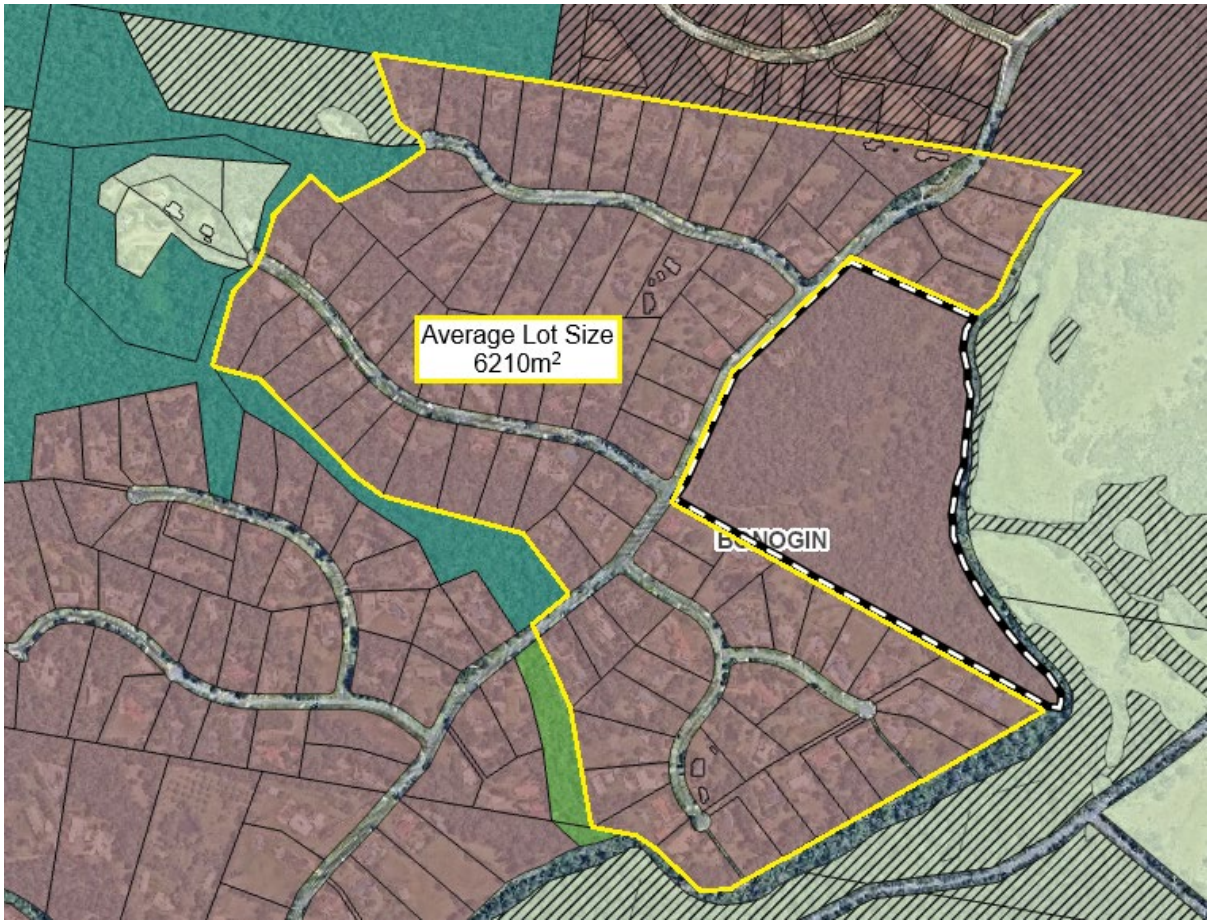


Figure 6: character analysis area

The following table provides a comparative analysis relevant to the proposed development and includes minimum lot size, average lot size and road frontage widths to inform practical decision making regarding the proposed development's ability to appropriately integrate into the existing area and maintain compliance with the Strategic framework benchmarks as follows:

Benchmark	Catchment Area	Proposed Development
Smallest lot	5,000m²	4,000m²
Average lot size	6,210m²	6,888m²
Minimum road frontage (fronting Glenmore Drive)	33.91m	37.61m

Table 12: Surrounding area assessment

As demonstrated in the table above, the proposal maintains a development outcome commensurate with the immediate catchment area in relation to lot size, density and road frontages. Importantly, the proposed allotments fronting Glenmore Drive maintain a consistent development outcome to that on the adjacent side, and as such, continues to support the existing lifestyle and amenity aspirations within the area.

Where allotments are proposed fronting the new internal road, future occupants will be made aware of the anticipated character, allowing for informed decision making as to whether the development will meet their own lifestyle and amenity aspirations (despite complying with minimum lot sizes).

In consideration of the above, the proposed development is demonstrated to maintain the amenity and lifestyle aspirations of residents within the Rural residential zone and results in an appropriate

subdivision of land to provide additional housing opportunities for residents seeking a rural character lifestyle.

Protection of matters of environmental significance

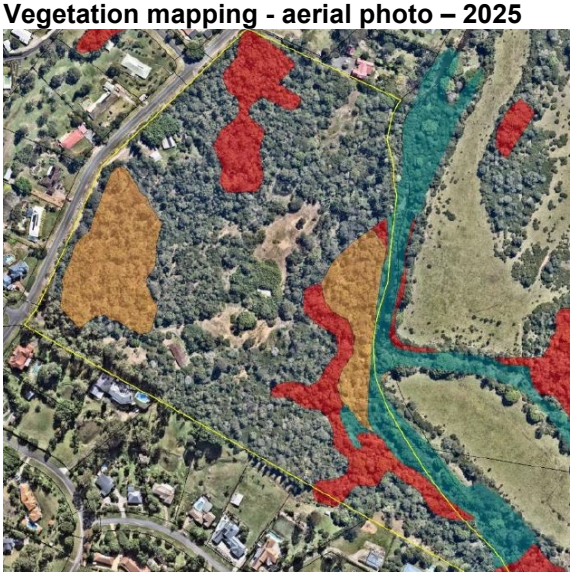
Theme	Element	Benchmark
Living with nature	Green space network	*3.7.3.1* *(1) The diverse green space network provides for recreation, community wellbeing, biodiversity, scenic amenity, water catchment management, cultural heritage, tourism, education and research. It includes:* *(c) biodiversity areas and other matters of environmental significance;* *(5) Waterways and riparian areas are protected as natural green space corridors to:* *(a) protect vegetation, wildlife habitat and ecological corridors;* *(b) protect scenic amenity;* *(c) provide continuous public access and parkland corridors for recreation, walking and cycling;* *(d) provide visual relief from the built environment and a retreat from developed areas;* *(e) provide flood mitigation, flood resilience, drainage and water quality functions;* *(f) provide natural and renewable water cycle processes (water health and water quality); and* *(g) protect foreshores from erosion and stormwater inflows.*
	Nature conservation	*3.4.7.1* *(1) The Gold Coast's biodiversity areas and other matters of environmental significance are conserved, protected, enhanced and managed to maintain a diversity of terrestrial, aquatic and marine species, ecosystems and ecological processes. Poorly protected regional ecosystems and habitat for threatened species, such as koalas, are enhanced.* *(6) Outside biodiversity areas, significant residual impacts on medium priority vegetation are managed, in order of priority, by:* *(a) avoiding significant adverse environmental impacts;* *(b) mitigating significant adverse environmental impacts where these cannot be avoided; and* *(c) offsetting any significant residual impacts.*
A safe, well designed city	Landscape character	***3.8.2.1*** *(6) Natural landscape areas are protected for their contribution to the city's scenic amenity and nature conservation* *(7) Natural landscape areas are protected for their contribution to the city's scenic amenity and nature conservation.*

Table 13: Strategic framework benchmarks

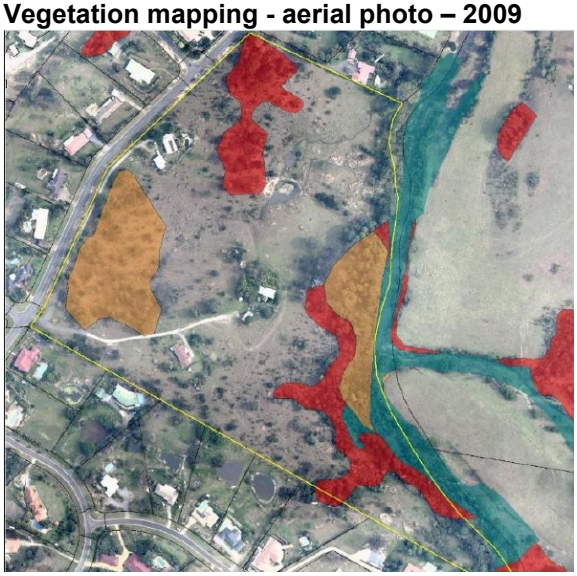
The Strategic framework benchmarks outlined in the table above seek the protection and enhancement of matters of environmental significance, recognising the ecological and scenic benefit these areas provide to the city.

The subject site features mapped matters of environmental significance including vegetation (General and Medium priority) and waterways (Major and Minor) as per the City Plan Interactive Mapping. It is noted that mapped vegetation areas are reflective of the site's historic arrangement with unmapped areas being natural re-growth that has occurred over time due to lack of onsite maintenance. This is demonstrated via the images below:

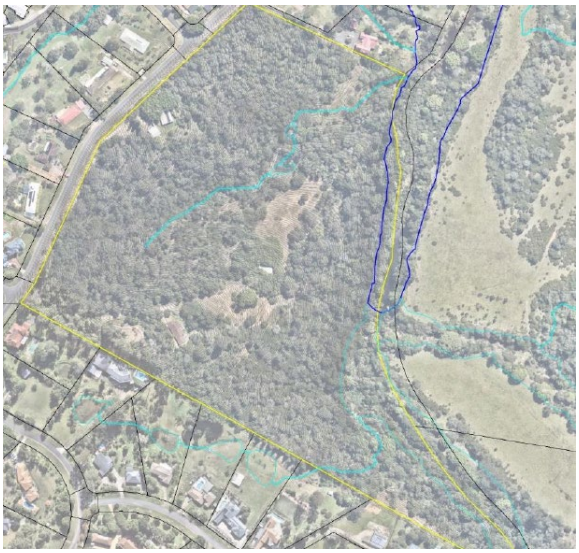
Vegetation mapping - aerial photo – 2025



Vegetation mapping - aerial photo – 2009



Waterway mapping - aerial photo – 2025



Waterway mapping - aerial photo – 2009



Figure 7: Historical mapping (Vegetation and Waterway overlay)

The proposed development seeks the removal of parts of the Medium and General priority vegetation to facilitate workable building pads for future dwellings and associated structures. In accordance with the Strategic framework, clearing of Medium priority vegetation outside of biodiversity areas is not prohibited, however significant residual impacts should be managed, in order of priority, by:

(a) avoiding significant adverse environmental impacts;

(b) mitigating significant adverse environmental impacts where these cannot be avoided; and

(c) offsetting any significant residual impacts.

As demonstrated within the Ecological Assessment, prepared by Ultimate Planning Solutions, dated February 2026, clearing of vegetation is limited to areas outside of the minimum buffer areas to mapped waterways. This clearing is considered compliant with (b) in that significant adverse impacts to the environment are mitigated, and protection of key environmental features (waterways and riparian buffer areas) remain protected in situ via the proposed covenant. As a result of the abovementioned measures and proposed environmental covenant:

- Approximately 44% of the site will be secured as environmental protection land through the establishment of environmental covenant
- Approximately 64% of mapped koala habitat will remain unaffected by the proposal and retain ongoing dispersal and connectivity value

5.5 Assessment Benchmarks

The following City Plan codes are applicable (or not applicable as discussed) to this application:

Zone code	Overlay codes	Development codes
• Rural residential zone code	• Airport environs overlay • Bushfire hazard overlay • Environmental significance overlay • Flood overlay • Landslide hazard overlay	• Reconfiguring a lot code • General development provisions code • Healthy waters code • On-site sewerage facilities code

Table 14: Assessment benchmarks

5.6 Key Planning Considerations

This section provides a detailed overview of the proposed development including design, servicing, engineering and environmental considerations.

5.7 Rural residential zone code

The purpose of the Rural residential zone code is to provide for residential development on large lots where local government infrastructure and services may not be provided on the basis that the intensity of residential development is generally dispersed.

The purpose of the zone is achieved through the Overall outcomes that provide guidance in relation to matters such as Land use, Character, Built form and Lot design. The proposed development has been assessed against the relevant Acceptable and Performance outcomes as follows:

Performance outcome	Acceptable outcome
PO7 **Where not on the Minimum lot size overlay map or Rural residential landscape and environment precinct** Average lot size is no less than 8,000m^2 and no lots have an area less than 4,000m^2.	**AO7** No acceptable outcome provided.

The proposed development complies with the minimum lot size requirement, however the average lot size is 6,888m^2 resulting in a 1,112m^2 shortfall. This benchmark is further reiterated within Overall outcome 6.2.21.2(2)(d)(ii), which states:

Lot design:

provides an average lot size of no less than 8,000m² to protect local amenity and character. To respond to the various constraints found in the zone the lot sizes may vary provided that no lot has an area less than 4,000m².

The proposed development is non-compliant with Overall Outcome (2)(d)(ii) in relation to proposing an average lot size less than 8,000m², however remains compliant in ensuring all allotments are over 4,000m².

Furthermore, and as discussed within the Strategic framework section of this report, the proposed subdivision remains in keeping with the existing character of the area and facilitates a dispersed, low intensity outcome via building envelope locations in keeping with setback requirements of the Rural residential zone code.

5.8 Overlay Codes

5.8.1 Airport environs overlay

The purpose of the Airport environs overlay code is to

(a) recognise Gold Coast Airport as essential economic infrastructure and protect and assure its ongoing operation and continued development;

(b) regulate development that may affect the operational efficiency of Gold Coast Airport at Coolangatta and the Airservices Australia Aviation Facilities related to the operation of the airport;

(c) minimise incompatible development within the public safety area adjacent to the airport;

(d) minimise the adverse impacts of airport noise on residential and other noise sensitive land uses in the vicinity of the airport.

The subject site features the Procedures for Air Navigation Services - Aircraft Operational (PANS-OPS) surfaces - PANS-OPS contour. Despite this, as the proposed development is for subdivision only (i.e. no built form proposed) the overlay is not considered relevant to the assessment of this application.

5.8.2 Bushfire hazard overlay

The purpose of the Bushfire hazard overlay is to ensure that risk to life, property and the environment as a result of bushfire is mitigated to an acceptable or tolerable level.

A Bushfire Risk Assessment and Risk Mitigation Compliance Report has been prepared by QLD Bushfire Risk Assessments to determine the Bushfire Attack Levels (BAL) in relation to the proposed development configuration. As per the findings of the report, the development meets an acceptable level of bushfire risk and can effectively function in the event of a bushfire.

5.8.3 Environmental significance overlay

The purpose of the Environmental significance overlay code is to identify and protect matters of environmental significance and ensure that development is consistent with, and contributes to, the achievement of the objectives of the Our Natural City Strategy.

As previously discussed within this report, an Ecological Assessment, prepared by Ultimate Planning Solutions, dated February 2026 and accompanying Rehabilitation Management Plan, prepared by Ultimate Planning Solutions, dated February 2026 has undertaken assessment of the proposed development against the Environmental significance overlay code and is considered to comply with all relevant benchmarks. Please refer to **Appendix G** and **H** for details.

5.8.4 Flood overlay

The purpose of the Flood overlay code is to regulate development occurring in flood affected areas to ensure development does not cause, increase or have cumulative potential to cause or increase, the risks and/or hazards associated with flooding.

The subject site features a small portion of the Flood overlay in conjunction with the adjoining Bonogin Creek located on the eastern side of the allotment. Given the flood extent is located well outside of the future building envelope areas, no further assessment is considered necessary for this application.

5.8.5 Landslide hazard overlay

The purpose of the Landslide hazard overlay code is to regulate development which occurs on land or part of any land containing steep slopes or unstable slopes.

The site features moderate landslide hazard areas, predominantly to the south east and south west of the site, matching with the existing waterway locations. Given the development proposes earthworks for level building pads in accordance with the Bulk Earthworks Plan, prepared by Legend Consultants, all matters are considered addressed.

Where landslide hazard areas are not included within the abovementioned report, these areas will form part of the covenant area and as such no building work / impacts to these areas will occur.

5.9 Development code assessment

5.9.1 Reconfiguring a lot code

The purpose of the Reconfiguring a lot code is to ensure that the reconfiguring a lot lays the foundations for high-quality urban design that supports the outcomes for the zone and is sensitive to the environment, topography and landscape features.

Assessment against the relevant provisions has been undertaken as follows:

Performance outcome	Acceptable outcome
PO1 Where the development is for residential uses and would result in allotments with an average finished slope that exceeds 10%: (a) earth working provides for finished ground levels that facilitate development of the allotments for the intended purpose and its related/ancillary areas (e.g. areas of useable private open space) without the need to provide additional retaining walls; and (b) earth working is undertaken in a way that provides good quality amenity outcomes for future lot users and to the public realm.	**AO1** Allotments have an average finished slope less than 10%.

Due to the topography of the site and land size, larger allotments will result in an average slope exceeding 10%. Despite this, development will be limited to the building envelope areas in which will facilitate flat building pads for future dwellings and associated structures in keeping with the intended purpose of the allotments.

5.9.2 General development provisions code

The purpose of the General development provisions code is to provide a consistent approach to city wide issues and avoid duplication of regulation throughout the City Plan.

Earthworks and treatment of retaining walls

Performance outcome	Acceptable outcome
PO9 Earthworks and retaining walls associated with the development do not create a negative visual impact upon neighbouring properties or the streetscape.	**AO9** Retaining walls and batters comply with the requirements of **SC6.12 City Plan policy – Land development guidelines, Section 3 – Change to ground level standards**.

Due to the topography of the site, 1:4 batters and retaining walls between allotments are proposed at a height of 1.5m. additionally, where batters are insufficient, retaining structures to the covenant areas are proposed as described below:

Proposed Lot	Retaining wall	Location
3	3m (1.5m tiers)	Rear of allotment (to environmental covenant)
4	1.5m	Rear of allotment (to environmental covenant)
5	3m (1.5m tiers)	Rear of allotment (to environmental covenant)
6	6m (1.5m tiers)	Rear of allotment (to environmental covenant)
7		
8	3m (1.5m tiers)	Front of allotment (Glenmore Drive
12	3m (1.5m tiers)	rear of allotment (to Bonogin Creek)
16	3m (1.5m tiers)	Rear of allotment (to environmental covenant)
17		
18	3m (1.5m tiers) 4.5m (1.5m tiers)	Side and rear of allotment (to environmental covenant and road reserve)

Table 15: Retaining wall heights and locations

All proposed retaining walls as described above will be constructed in accordance with SC6.12 City Plan policy – Land development guidelines, Section 3 – Change to ground level standards.

In addition to the abovementioned, due to the topography of the site, allotment configuration and required internal road access levels, a 7m (reducing) retaining wall is required between the proposed internal road and proposed Lots 7 and 18 as demonstrated below.

The wall is proposed entirely within the private allotments and does not form part of the road infrastructure to the extent demonstrated.

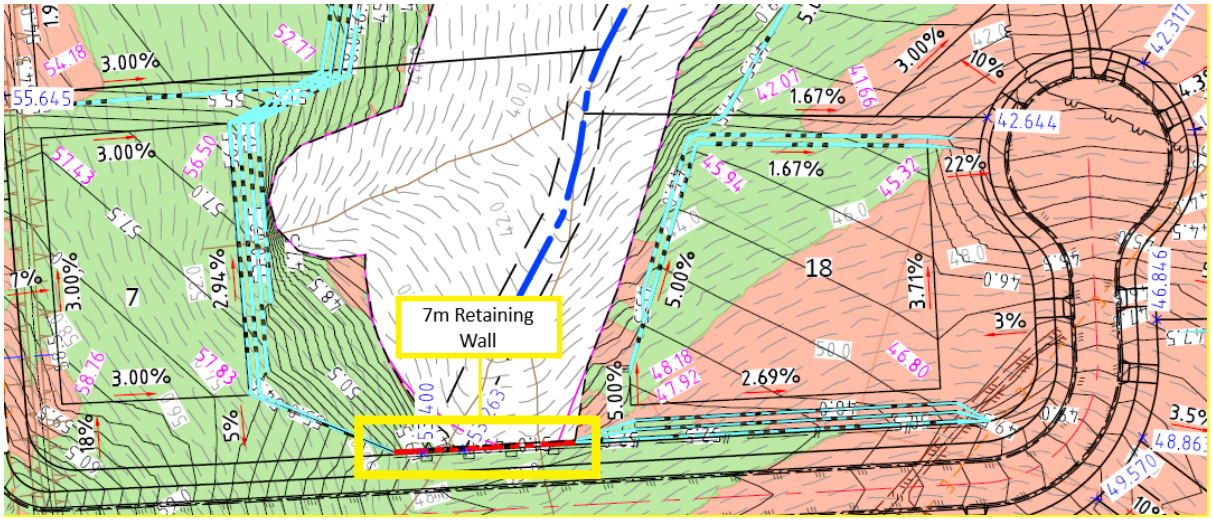


Figure 8: Proposed 7m retaining wall

Due to the proposed allotment topography, proposed Lot 18 is identified as the allotment most impacted by the wall and as such has been assessed against the Performance outcome, where considered to comply based on the following:

Distance from building envelope

As per the submitted Bulk Earthworks Plan, prepared by Legend Consultants, the highest portion of the wall is located at CH80 approximately 31m from the corner of the building envelope of proposed Lot 18. When considering the direct interface to the building envelope of proposed Lot 18, the wall is approximately 14m away and is 3.5m in height (CH110) reducing to 2.1m in height (CH160). Given the substantial distance between the highest part of the wall and the height of wall directly interfacing the building envelope area, amenity impacts are considered to be appropriately managed within a rural context.

Vegetation buffer

As per the Rehabilitation Management Plan, prepared by Ultimate Planning Solutions, dated February 2026, rehabilitation works are required interfacing the highest part of the wall and proposed Lot 18, resulting in a vegetated buffer that will obscure views and thus minimise the visual impact of the wall.

Position

The retaining wall is positioned to the south of proposed Lot 18 and as such does not pose shadow impacts that may negatively impact the amenity of future development occurring within the building envelope area.

In consideration of all matters above, the proposed retaining wall is considered to comply with Performance outcome PO9 in mitigating negative visual impact and as such is appropriate in this instance.

5.9.3 Healthy waters code

The purpose of the Healthy waters code is to:

(a) protect the quality of the city's waters and watercourses by managing the impacts of development on quality and quantity of surface and ground water runoff; and

(b) ensure that development does not cause adverse impact on people and/or property.

Please refer to the Engineering Infrastructure Report, prepared by Legend Consultants, for a full assessment against the Healthy waters code.

5.9.4 On-site sewerage facilities code

The purpose of the On-site sewerage facilities code is to ensure that on-site sewerage facilities do not cause any environmental harm or health risk.

As previously mentioned, the development will be required to facilitate on-site effluent disposal systems, as no available sewer infrastructure is provided within proximity of the site. In response to the above, a Site & Soil Wastewater Evaluation Report has been prepared by Country-Wide Water, demonstrating indicative tank capacity and LAA areas for a typical 4-bedroom dwelling.

6 Application Fee

In accordance with the City of Gold Coast Register of Fees and Charges 2025-2026, It is anticipated that the application fee will be calculated at **$21,924.00**.

7 Conclusion

This town planning report has been prepared on behalf of Salt Development Projects, in support of a development application seeking a Development Permit for Reconfiguring a lot (1 into 18 lots) over 98 Glenmore Drive, Bonogin, described as Lot 1 on RP218875.

The application has been assessed against the relevant requirements of the Planning Scheme and is demonstrably appropriate for the subject site. The proposal is generally consistent with the relevant codes and outcomes of the Strategic framework, Rural residential code, Reconfiguring a lot code and all relevant overlay and development codes and has sufficient merit to warrant approval. Consequently, the application is recommended for approval subject to reasonable and relevant conditions.

This town planning report has demonstrated the following key town planning grounds as the basis for the above recommendation:

- The proposal maintains a development outcome that is commensurate with the character of the area and anticipated development within Rural residential zoned allotments within the Bonogin area.
- The proposal maintains key matters of environmental significance with future rehabilitation works improving the ecological attributes of the site.
- The proposal can be suitably services via existing water and proposed sewer infrastructure.

In conclusion, it is recommended that a Development Permit for Reconfiguring a Lot be granted in accordance with the plans and documentation submitted.

Yours sincerely,

HPC Planning
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