

2 April 2026

Chief Executive Officer
City of Gold Coast
PO Box 5042
GCMC 9726

Via Email: mail@goldcoast.qld.gov.au; kreid@goldcoast.qld.gov.au

Council Reference: COM/2024/317
Our Reference: 23-8110
Attention: Kyra Reid

Dear Kyra,

RE: Response to Further Advice and Ongoing Discussion - Material Change of Use for a Multiple Dwelling (73 Townhouses); Reconfiguring a Lot (Boundary Realignment and New Road); and Operational Works (Change to Ground Level and Vegetation Clearing) at 202 Baileys Mountain Road, Upper Coomera

We write on behalf of our client, MG Land Pty Ltd, in response to a Further Advice letter issued by Gold Coast Council on 25 July 2025 and further advice received via email on 27 January 2026 regarding the abovementioned development application.

The following supporting documentation is submitted as part of this response:

- Revised Architectural Plans by Red Door Architecture
- Revised Landscape Concept Plans by Dunn Moran Landscape Architecture
- Revised Civil Engineering Report (including Civil Engineering Drawing Suite) by Cozens Regan
- Revised Stormwater Management Plan by Cozens Regan
- Traffic Engineering Letter by Colliers
- Traffic Functional Layout by Colliers

A revised Hydraulic Impact Assessment will be provided as an addendum, however it is noted that modelling results are within satisfactory limits, and the report is to be provided for completeness.

Notice of Minor Change

In the process of responding to Council's further matters, minor changes are proposed to the development. In particular, the revised intersection design and allowance for a

2m footpath have marginally decreased the depth of the development area. This general contraction of the footprint has caused a redistribution of “clusters” of dwellings throughout the site, resulting in the removal of 1 dwelling. The proposal is now for 72 dwellings.

To the extent changes made to the proposal plans are not in direct response to the Council's Further Issues, these changes are considered to amount to no more than a Minor Change to a development application as outlined in Schedule 2 of the *Planning Act 2016*. In particular:

- The changes do not result in substantially different development;
- The revised proposal continues to require impact assessment;
- No prohibited development is proposed; and
- The revised application would not require referral to extra referral agencies.

Further Advice Letter Items – 25 July 2025

This letter now sets out the applicant's response to Council's 25 July 2025 further advice letter, noting that some items are superseded by Council's 27 January 2026 email.

Transport Assessment

1. Transport Code

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

(i) through (ix)

Response

It is understood that this item is superseded by Council's 27 January 2026 email which includes more detailed requests around intersection design. The SISD matter is resolved with the restriction on right turn movements into the new road and the amended functional layout prepared by Colliers. Please refer to the applicant's response to Council's 27 January 2026 email below.

2. Transport Code

General – PO20

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

Response

In response to Council's request, one of the visitor bays in the north western 'blind aisle' at the end of driveway 2 is removed in favour of a turnaround bay, which can be conditioned accordingly. The visitor space is relocated to be adjacent to unit 42.

Subdivision Engineering

3. Public Road Vehicle Turning Facility

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

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

Response

The applicant invites Council to condition a temporary "T-Head" turnaround easement at the end of the new road, prior to commencement of use of Stage 1, to be surrendered when the road otherwise connects through to the remainder of the network (delivered by others). The exact location is to be determined at detailed design in cooperation between developers.

In addition, it is noted that the complex will not be gated.

4. Indicative Road Network and New Public Road Street Classification

Response

It is understood that this item is superseded by Council's 27 January 2026 email. Please refer to below response and attached traffic functional layout and civil engineering plans.

Hydraulics and Water Quality

5. Quality and Quantity

- a. Retaining walls are generally not supported within stormwater management systems. The use of walls around most of the basin's perimeter may pose a public safety risk, particularly given the proximity to the future park's pedestrian footpath. Please provide a public safety risk assessment within the Stormwater Management Plan, demonstrating how the design complies with Water by Design guidelines, the Landscape Design Guidelines (LDG), QUDM, and Performance outcome PO10 of the Healthy waters code.
- b. Amend the drawings "Concept Bio Basin Plan and Details" and "Concept Civil Works" to:
 - Clearly show the setback dimensions of the basin from all site boundaries
 - Label the recreational link and/or show it in a distinct colour, and

clearly label the road to be dedicated.

- c. An easement in favour of the subject site is required over the private stormwater pipe located within Council's land, from the basin to the waterway. Please update the relevant drawings to clearly show the proposed easement extension.

Response

The use of retaining walls for a privately owned and maintained stormwater basin is considered appropriate. A public safety risk assessment is provided in Section 5.0 of the attached Site Based Stormwater Management Plan by Cozens Regan.

Refer to drawing SK05 which now shows:

- All setback dimensions from the basin to the public recreation link
- Safety in design features for the basin including vehicle barrier, safety signs, and pedestrian safety fencing.
- An easement over the stormwater pipe. The easement referenced above can be conditioned accordingly.

6. Overland flow paths

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

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

Response

A revised hydraulic assessment will be provided as an addendum to this response. Preliminary model results are showing the design performing within acceptable limits, and in accordance with Council's request above.

7. Public Safety

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

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

Response

A public safety risk assessment is provided in Section 5.0 of the attached Site Based Stormwater Management Plan by Cozens Regan. Safety fencing is now indicated around the basin perimeter.

8. Maintenance Access

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

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

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

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

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

- a. Extend the easement upstream of the proposed road (at the culvert inlet) in accordance with Section 4.4.5.3 of the LDG, with a minimum length of 5

- metres. Update relevant drawings to confirm sufficient maintenance access.
- b. Dedicate the area marked as easement over the drainage channel and the outlet of the proposed culverts to Council, to facilitate ongoing maintenance.

Response

The proposed stormwater basin is to be privately owned and maintained. The revised site based stormwater management plan by Cozens Regan illustrates:

- Minimum 2.5m wide access
- No vehicle access over filter media area.
- A path around approximately 40% of the basin perimeter

An indicative easement is shown approximately 5m upstream of the proposed culvert beneath the new road.

The basin is suitable for access via typical maintenance machine (small excavator or backhoe, mower/brush cutter, pressure washer etc).

Further Advice Email Items – 27 January 2026

The content of Councils 27 January 2026 email is provided in grey below. Numbering has been provided by the author for ease of reference.

1. Baileys Mountain Road / Old Coach Road intersection

To address failure of the Baileys Mountain Road / Old Coach Road intersection, the following conditions will be imposed / works will be undertaken:

- (i) Dedication of land at 202 Baileys Mountain Road, Upper Coomera as identified in LGIP.
- (ii) Install non-trunk traffic signals at the Reserve Rd / Rangeview Rd intersection (as identified in our Information Request).
- (iii) The City will undertake planning to realign Baileys Mountain Rd to create a fourth leg of the roundabout at the intersection of Reserve Rd / Old Coach Rd. These works are to be delivered by the City, with a nominal construction timeframe of 2030-31.

Response

In response, the applicant notes:

- With regard to (i), trunk land dedication for the upgrade of Baileys Mountain Road as identified in the LGIP is illustrated on architectural drawings;
- With regard to (ii), this item was not identified in any prior information requests. The attached 12 March 2026 traffic advice by Colliers finds that “the identified potential external infrastructure works condition of signalling the Reserve Road /Rangeview Road intersection is not considered to be relevant or reasonably attributable to the subject proposed residential development”. This is

unsurprising as the intersection is over 1 kilometre away from the subject townhouse development and there is no requirement for users of the proposed development to use the intersection in question. It is the applicant's view that the non-trunk signalisation of the intersection mentioned at item (ii) is not a permitted development condition pursuant to the Planning Act 2016.

- With regard to (iii) this is noted.

2. Baileys Mountain Road / New Road intersection

To address non-compliant sight distances at the proposed Baileys Mountain Road / New Road intersection, a condition will be imposed requiring the construction of an 'interim' intersection arrangement, as follows:

- (i) Priority-controlled intersection (with turning lanes in Baileys Mountain Road), with a ban on right turn movements into the New Road, from Baileys Mountain Road (i.e. facilitating left-in/left-out and right-out movements)
- (ii) The design shall be generally consistent with that submitted by Colliers (report ref. 23BRT0507_LT02_2, dated 1/10/2025, relating to Council re. COM/2024/317), however, shall include the following modification:
 - a. Median, on southern approach of Baileys Mountain Road, to be a raised concrete island also (rather than line marking) to assist with physically preventing right turns into the New Road (from BMR). Note – the geometry of the concrete island on the southern approach shall be designed consistent with the swept path of the 'design' vehicle, as per Colliers' report (with chevron line marking taking the place of the raised island, only at the location of the truck path).
- (iii) These works are non-trunk.
 - i. Note - The 'interim' intersection arrangement (and restriction of movements) will be removed coincident with Council's planned upgrade of the Reserve Road / Old Coach Road roundabout and realignment of Baileys Mountain Road (nominal timeframe of 2030-2031).

Response

In response, the applicant notes:

- With regard to item (i) and (ii), this matter has been addressed in the attached RPEQ signed traffic functional layout by Colliers and civil engineering documentation by Cozens Regan. A raised concrete island is now shown; and
- With regard to item (iii), this is noted.

3. Active transport network

Each development will be required to deliver a non-trunk, 2m wide footpath along the entire frontage of each site (including Baileys Mountain Road) to provide active

transport connection between the development site and external footpath network.

Response

The revised traffic functional layout by Colliers and civil engineering documentation by Cozens Regan has shown a new 2m wide footpath at the location of the new intersection works on the southern side of Baileys Mountain Road. Whilst the applicant is not opposed to improving pedestrian accessibility in the area, a 2m path along the full length of the sites Baileys Mountain Road frontage (some 250m) would be a significant extent of sacrificial work, as the footpath will be removed when the road is built by Council to its ultimate alignment. It is noted that the proposal is delivering a public recreation link close to Reserve Road, and the complex will not be gated, providing opportunity for pedestrian connection within the site. We look forward to further resolving this item with Council through conditions.

We trust the above and accompanying information will allow Council to issue a prompt decision. Should further clarification or information be required please contact our office or the undersigned on (07) 3360 4200.

Yours faithfully

URBAN STRATEGIES PTY LTD



Hayden Gianarakis
DIRECTOR