

Date: 06 May 2026
Contact: Kyra Reid
Location: City Development
Telephone: 07 5582 8730
Your reference: 2025-03-740
Our reference: ROL/2026/35

Needham Ground Pty Ltd and JNG Property Investments 1 Pty Ltd
C/- Enhance Urban Planning (Brendon Walkinshaw)
PO BOX 7143
SOUTHPORT PARK QLD 4215

Dear Sir/Madam

Information Request

I refer to the development application lodged by:

Needham Ground Pty Ltd and JNG Property Investments 1 Pty Ltd

in relation to development of land/premises described as:

Lot 187 RP173728 – 65 Courtney Drive, UPPER COOMERA QLD 4209

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.

Assessment Manager Kyra Reid A/ Senior Planner (07) 5582 8730 kreid@goldcoast.qld.gov.au	Planning Coordinator Adam Morris Coordinator Planning Assessment (07) 5667 3856 asmorris@goldcoast.qld.gov.au	Environmental and Bushfire Assessment Peter Joy Senior Environmental Assessment Officer (07) 5582 8649 pjoy@goldcoast.qld.gov.au
Landscape and Open Space Ryan Smith Landscape Planner (07) 5582 8151 rsmithy@goldcoast.qld.gov.au	Transport Assessment Elisha Augustine Senior Transport Engineer (07) 5582 8806 eaugustine@goldcoast.qld.gov.au	Civil Engineering Aaron Kwok Civil Engineer (07) 2114 3195 akwok@goldcoast.qld.gov.au

INFORMATION REQUEST

Planning Assessment

1. Small lots / plan of development

The applicant is requested to address Performance outcome PO14 of the Reconfiguring a lot code with regard to small lots. It is necessary to demonstrate that a Dwelling house can be accommodated that meets the requirements of the Small lot housing (infill focus) code.

The applicant should also note that, once a development layout / footprint has been further refined, a concurrent pre-referral response for future building work (similar to a POD) can be lodged. This can be workshopped with the applicant closer to a response to this Information Request being provided.

2. VXO allocation plan

In relation to the above item, the applicant is requested to provide a VXO allocation plan which incorporates all information required by Civil Engineering (VXO width and separation to gully pits) and Landscape Assessment (i.e., location of street trees) as well as on-street parking availability on the single plan. The applicant should note that all VXO's for narrow lots will be required to be delivered by the developer prior to plan sealing each stage.

Landscape and Open Space

3. Plan of Subdivision

The submitted Plan of Subdivision does not clearly identify the areas proposed for future conservation purposes or the areas intended to function as drainage reserves within the Yaun Creek – Green space network. This information is required to demonstrate compliance with Overall outcome (OO) 6.2.15.2(3)(xi) of the Emerging community zone code, which requires Yaun Creek to be a rehabilitated natural green space corridor. Accordingly, the applicant is requested to submit an amended Plan of Subdivision clearly demonstrating the following:

- The full extent of the Yaun Creek – Green space network (public open space) proposed to be dedicated to Council as future Conservation land.
- The location, extent and proposed tenure of all Drainage reserve areas, including confirmation of whether these areas are intended to be dedicated to Council. Drainage reserves/lots are to be wholly located outside of public open space lots for Conservation purposes.
- The total area of land proposed for dedication for conservation and drainage purposes, clearly delineated, labelled and dimensioned.

4. Yaun Creek – Green Space Network (Public Open Space)

Officers have reviewed the submitted Rehabilitation Management Plan (RMP) and Bushfire Management Plan (BMP) and note that the proposed rehabilitation extent does not align with the proposed scale of the future conservation lot. The RMP currently addresses rehabilitation works limited to approximately 30m from the centreline of Yaun Creek and does not include the extended area to the edge of the future public road verge interfaces. In addition, the BMP does not align with the Bushfire Attack Level (BAL) contours with the full riparian rehabilitation extent. To address these matters, the applicant is requested to submit amended plans addressing the following:

- a. An amended Rehabilitation Management Plan (RMP) that includes revegetation and management treatments across the full lot to be dedicated to Council for Conservation purposes.
- b. An amended Bushfire Management Plan (BMP) showing BAL contours aligned with the full rehabilitation extent of the full lot to be dedicated to Council for Conservation.
- c. Confirmation that any bushfire maintenance requirements will be located outside the conservation lot proposed for dedication to Council.
- d. Clarification of how the rehabilitated areas will be managed interfacing with the proposed Drainage reserves.

5. Retaining Works – Conservation Lot

Officers note the submitted earthworks drawings indicate retaining walls along the interface with future public road reserves and along the boundary of the Yaun Creek conservation lot. Retaining walls within Conservation land are not supported, as they are inconsistent with SC6.12 City Plan policy – Land development guidelines and are considered to place an unreasonable long-term maintenance and management burden on Council. Accordingly, the applicant is requested to submit amended drawings addressing the following:

- a. Any retaining walls associated with the development are requested to be wholly located outside the future Conservation lot. Please note that retaining is also not supported in the public road. The applicant may explore a vegetated batter within the conservation lot.
- b. Amended preliminary earthworks plans and updated cross-sections are requested to be submitted clearly identifying all retaining wall locations, batters, setbacks and treatment types.

6. Retaining Works – Private Land

Officers note discrepancies in the submitted earthworks drawings indicate retaining walls within private land along the interface with future public road reserve, in particular with the interface of proposed Lot 2. To mitigate any potential negative interfaces with the road frontage, the applicant is requested to submit amended earthworks drawings addressing the following:

- a. Any retaining walls within the private lot direct fronting an existing or future public road reserve is requested to be identified and setback a minimum 600mm from the front boundary.
- b. Any proposed retaining wall facing an existing or future public road verge is requested to be nominated with a high-quality treatment (e.g. Split-face charcoal concrete sleeper or similar) and include garden area directly between the retaining wall and boundary to support screening shrub plantings. Any tiered retaining wall outcomes must be of a design capable of accommodating planting in between tiers.

7. Statement of Landscape Intent – Fencing Plan

An amended Statement of Landscape Intent (SLI) is requested to be submitted reflecting any changes to the site layout as a result of this Information Request Letter. Additionally, any SLI is requested to include additional details relating to the fencing design and locations.

Environmental and Bushfire Assessment

8. Bushfire Assessment

The Bushfire management plan has identified a small area of low hazard linear park adjoining the Yaun Creek conservation corridor. The area will require regular maintenance similar to that of an 'outer bushfire radiation zone'. The applicant is requested to amend the Bushfire management plan by Bushfire Risk Reducers to address the following:

- a. Investigate the potential to rehabilitate the area identified as low hazard linear park with low flammable species from RE12.3.1(a) (Gallery rainforest on alluvial plains). This is to remove the need for ongoing mowing to achieve an acceptable level of bushfire mitigation.
- b. Confirm the radiant heat flux calculations in consideration of any changes to the conservation corridor and low hazard linear park
- c. Changes to planting species for bushfire mitigation purposes are to be incorporated into the site Rehabilitation management plan by Biome Environmental and Water Pty Ltd.

9. Retention of Tree 20 – Rusty Fig

The applicant is requested to retain Tree 20 *Ficus rubiginosa* (Rusty fig) as part of the redesign of the Stormwater treatment infrastructure that is being requested by Civil Engineering. It is noted that the creek corridor has been measured from the centreline of the creek and not the top of high bank.

10. Rehabilitation management plan

The applicant is requested to amend the Rehabilitation management plan (RMP) by Biome Pty Ltd to address the following:

- a. Ensure the RMP includes the entire Yaun Creek corridor width including rehabilitation of the low hazard linear park and the stormwater treatment basin and batters.
- b. Include *Eucalyptus propinqua* (Small fruited grey gum) in addition to species from RE12.3.11 given its occurrence onsite within the Yuan Creek corridor.
- c. The area identified as low hazard linear park is to be rehabilitated with RE12.3.1(a) (Gallery rainforest on alluvial plains species) to assist in bushfire mitigation – to be confirmed by bushfire consultant.
- d. Any further changes as recommended by the Bushfire consultant for bushfire mitigation purposes.
- e. Mowing zone for the sewer line is removed due to the tunnel boring of the sewer line negating the need to remove vegetation. This area should be an area of assisted regeneration.

Transport Assessment

11. Sight distance assessment – New intersection

The applicant is requested to demonstrate that the proposed new intersection on Courtney Drive has adequate sight distance in accordance with the requirements of Austroads, where the frontage road speed should be the legal speed limit or 85th percentile speed, whichever is higher. This is to be prepared by an RPEQ traffic engineer.

Note: Applicant is required to consider proposed road upgrades associated with adjacent development.

12. Sight distance assessment – Direct lot access

The applicant is requested to demonstrate that indicative property access locations for proposed lots 1, 2, 12, 13 and 16 achieve safe sight distance in accordance with Section 3.2.4 of AS2890.1:2004, where the frontage road speed should be the legal speed limit or 85th percentile speed, whichever is higher. This is to be prepared by an RPEQ traffic engineer.

Note: Applicant is required to consider proposed road upgrades associated with adjacent development.

13. Advice Notes:

In the event of an approval, the applicant is advised that the following external road network upgrades will be conditioned:

- Upgrade of Courtney Drive to a 'Residential Collector Street' classification for the full length of Courtney Drive – being from the current termination point of the 'upgraded' Courtney Drive profile (i.e. just east of the boundary between lots 1011SP351084 and 187RP173728) to Baileys Mountain Road.
- Realignment of Courtney Drive (east of the subject site) such that the carriageway is positioned centrally within the road reserve corridor for its entire length, and relocation of the intersection of Courtney Drive with Baileys Mountain Road (as a result), providing separation to the Jenkins Court intersection.
- Upgrades to the broader road network as determined necessary by Council's Infrastructure Gold Coast section (Transport Network). This may include intersection works onto Reserve Road (not excluding other necessary infrastructure upgrades).

Note: The City is in receipt of multiple development applications within the Courtney Drive Emerging Community Precinct. Each development application is in different stages of assessment, it will be necessary to align all developments consistently to ensure a coordinated and sequenced delivery of necessary infrastructure.

Civil Engineering

14. Amendments to Geotechnical Report

Council acknowledges the provided geotechnical report titled "Geotechnical Investigation and Landslide Risk Assessment for Proposed Residential Subdivision – 65 Courtney Drive" dated 8/12/2025 – version 1 by Pacific Geotech.

The applicant is requested to provide an amended geotechnical report, ensuring that the below items are addressed in full:

- a. Referring to provided earthwork drawings titled "EARTHWORKS SECTIONS SHEET 1" and "EARTHWORKS SECTIONS SHEET 2" by BORNHORST + WARD revision C dated 24.03.26, there are proposed earthworks that exceed the limits as detailed within the Land development guidelines – Change to ground level standards. Therefore, the applicant is requested to provide global stability analysis for the critical retaining walls and batters and demonstrate a long-term FOS of 1.5 or greater.
- b. The provided geotechnical currently refers to a proposed subdivision development of 1 into 37. The applicant is requested to amend the geotechnical report so that the report is site specific and to ensure all information within reflects the proposed development.

Note: should any changes to the proposal occur as a result of this information request, this should be captured in any amended reporting requested above.

15. Vehicle crossings locations

The proposal plan shows indicative locations of vehicle crossings for all proposed lots and the siteworks and drainage layout sheet plan shows proposed location of stormwater gully pits.

However, the application package does not include sufficient information to demonstrate compliance with Performance outcome PO13 or Performance outcome PO18 of the Reconfiguring a lot code or Specific outcome 3.3.4.1 (8) (e) of the New communities element of the Strategic framework. .

In order to demonstrate compliance with the above benchmarks, the applicant is requested to submit a VXO allocation plan/s showing:

- a. Proposed VXOs for all proposed Lots, in particular Lots 18 to 21 and Lot 14 to Lot 7, and

demonstrate accordance with the City's Land Development Guidelines. Officers consider a shared VXO arrangement may be appropriate for constrained lots, maximising space for on-street car parking and street trees;

- b. Proposed VXOs must be (minimum) 4m wide at the kerb line and (minimum) 3m wide at the property boundary;
- c. Proposed gully pits;
- d. Proposed electrical pillars;
- e. Proposed VXOs shall have (minimum) 1m clearance from any parts of proposed gully pits at the kerb line;
- f. Proposed VXOs shall have (minimum) 1m clearance from any parts of proposed electrical pillars; and
- g. The (minimum) 7m separation at the kerb line between proposed VXOs for neighbouring lots should be provided for on-street car parking spaces. Maximum separation at the kerb line between proposed VXOs adjacent to the proposed cul-de-sac head should be provided.

16. Hydraulic Impact Assessment

The site has an external catchment that discharges as overland flow through the subject site. The overland flow path on the site must not be altered in any way that could inhibit or modify the characteristics of existing overland flow on neighbouring properties, or that may increase flood damage elsewhere.

While alterations or realignments of the overland flow path may be considered, any changes must effectively manage the external flow throughout the site. The development must demonstrate how it will accept external flow and convey runoff to a lawful discharge point without causing adverse hydraulic impacts to surrounding properties during all standard events (63.2% to a 1% AEP).

To achieve this, the applicant is requested to prepare a hydraulic impact assessment (HIA) using a two-dimensional hydraulic model, such as TUFLOW.

The HIA report must include maps illustrating maximum water levels, maximum depths, and maximum velocities for all pre- and post-development scenarios across all AEP events. Additionally, the applicant must provide afflux maps that indicate the differences between the pre- and post-development scenarios for both water levels and velocities for all AEP events.

Note: should any changes to the proposal occur as a result of this information request, this should be captured in any amended reporting requested above.

17. Amendments to Stormwater Management Plan

The following additional information is requested to be incorporated into the provided stormwater management plan (SWMP):

- a. The applicant has provided peak flow calculations and the proposed quantity control strategy of detention basins using the Rational Method. The use of Rational Method is not a supported method by Council. Therefore, the applicant is requested to revise the peak flow calculations and stormwater quantity measures by using an appropriate hydraulic modelling software (such as DRAINS) for different AEP events.
- b. The applicant is requested to provide engineering drawings detailing both quality and quantity considerations within the proposed bio-retention systems and the overall site stormwater drainage layout. The stormwater engineering drawings are required to include, but not limited to, indicative dimensions, invert levels, cross-sections, inlet and outlet control details, and associated drainage infrastructure. Please refer to SC6.12 of the City Plan policy – Land development guidelines – 8. Engineering drawings, documents and reports for further details. Furthermore, the applicant is to refer to Bioretention Technical Design Guidelines by Water by Design for further details.
- c. The applicant has provided catchment calculations for both North and South catchment, the provided calculations in section 4.1.2 – Peak Flow Discharge – North Catchment and

section 4.1.3 – Peak Flow Discharge – South Catchment, lack sufficient information and details demonstrating how catchment areas were found. Therefore, as per the City Plan policy – Land development guidelines – 8. Engineering drawings, documents and reports, the applicant is requested to provide Council with detailed catchment plans detailing both North and South catchment areas.

- d. Within section 4.1.4 – detention systems, the applicant has proposed combined treatment and detentions basins for both Northern and Southern catchments to mitigate peak flows from the proposed development to the existing water traversing through the site. The proposed quantity strategy states the required detention volumes to mitigate peak flows but does not show any calculations detailing how these detention volumes were found. Furthermore, the applicant has clearly stated that the proposed strategy will maintain or improve existing peak flows without providing calculations or comparative hydraulic analysis between pre and post development peak flows. Therefore, the applicant is requested to provide further information detailing detention volume calculations and demonstrate that peak flows are to be maintained or improved following with the proposed mitigation strategy.
- e. Provide an operations and maintenance outline for all treatment elements and the overall treatment train, including:
 - i. Predicted maintenance frequency,
 - ii. Inspection and rectification triggers,
 - iii. Access requirements and constraints, and
 - iv. Nominated responsibility during construction and operational phases.
- f. Provide copies of the electronic model files used to develop the SWMP (e.g., MUSIC for quality; DRAINS/XP_STORM or equivalent for quantity) for Council records and review. Please be aware that any interrogation of the files may lead to a further information request.

Note: should any changes to the proposal occur as a result of this information request, this should be captured in any amended reporting requested above.

18. Slope gradients for lot access

The civil engineering bulk earthworks plans provided indicate relatively steep vertical slopes for the proposed access strips for proposed lots, in particular Lot 21 and Lot 8. However, these plans provided do not specifically demonstrate the vertical slope gradient in these areas.

The applicant is requested to provide amended longitudinal and cross sections to demonstrate that access strip areas can achieve appropriate slope gradient from the road carriageway to future building envelopes in accordance with Council's land development guidelines and AS2890.1:2004.

19. Waste Servicing

It appears that Lots 14 and 19/20 do not have sufficient frontage for waste collection (i.e. two 240L wheelie bins for each lot). Council has concerns that the frontage for these lots and associated vehicle crossovers do not afford sufficient room for the temporary storage of bins without adversely affecting other lots (i.e. bins blocking driveways).

A concrete bin pad/s may be required should there be insufficient frontage for these lots.

The applicant is requested to amend the proposed ROL plans indicating the proposed bin servicing point for each lot, ensuring no conflicts with other assets such as driveways.

20. Waste Servicing

Council acknowledges that the proposed roads in the northern and southern halves of the development will eventually tie into the roads to the eastern development. However, as there is no guarantee when / if those developments will progress, it is requested that each of the new roads provides a suitable turning area for a waste collection vehicle.

Council's preference is for the inclusion of a minimum 18m diameter cul-de-sac head at each end of line. This outcome would ensure the bins for Lots 6 and 16 can be collected fronting their respective lots.

Alternatively, if the applicant chooses not to provide a 18m diameter cul-de-sac and provide an alternate solution for a temporary waste collection vehicle turnaround provision instead, then this temporary arrangement (i.e. Y or T end) will require swept path certified by an RPEQ as outlined below

- a. Demonstrate by submitting a swept path analysis complying with AS2890.2 and certified by an appropriately qualified RPEQ that a Waste Collection Vehicle (WCV) can adequately manoeuvre unimpeded through the development to each waste collection point as outlined below. Swept path requirements are as follows:
 - Swept path analysis is to be generated by AutoTurn, AutoTrack or similar.
 - Plans must demonstrate vehicle specifications in accordance with the 'City Plan Policy – Solid Waste Management' including the kerb-to-kerb turning radius as nominated in Appendix C of SC6.16 City plan policy – solid waste management code
 - Manoeuvring clearances in accordance with AS2890.2 must be clearly depicted on drawings and demonstrate no obstructions exist for all waste servicing manoeuvres.
 - Reversing movements on-site are to be kept to a minimum and access to the development from the road is to comply with AS2890.2.

21. Water reticulation – Advice Note:

Council acknowledges the provided plan titled "SITEWORKS AND DRAINAGE LAYOUT SHEET" – drawing DA-C30, Rev C dated 24.03.26 by Bornhorst + Ward.

This drawing includes a note stating "Connect internal water reticulation to adjacent development end cap. Refer COM/2024/349". As there is uncertainty as to when the adjacent COM will be completed, the applicant is advised that conditions of approval for this ROL application will restrict the development connecting to the Council water infrastructure until the COM is completed and the works are accepted on maintenance, which will affect when the affected lots can achieve plan sealing.

Additionally, Council will include conditions requiring the water main along the southern half to connect to both ends of Valley Circuit, rather than just the south as indicated on the aforementioned drawing.

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, Kyra Reid, copied into the email kreid@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



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