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HPC Ref:
Council Ref: ROL/2026/37

5 May 2026

Sent via: email

City of Gold Coast
PO Box 5042
GCMC, QLD 9729
mail@goldcoast.qld.gov.au

Attention: Jozef Ewing

Dear Jozef

Response to Action Notice – Not Properly Made Application – Assessment Manager for Development permit for Reconfiguring a Lot (one (1) into eighteen (18) lot subdivision at 98 Glenmore Drive, Bonogin, properly described as Lot 1 on RP218875

This Action Notice was issued by the City of Gold Coast Council as assessment manager on 21 April 2026.

This correspondence is accompanied by supporting documents and additional information as demonstrated below.

Attachment	Report
A	Landslide Risk Assessment Report, prepared by PTG Consulting
B	Email correspondence between Legend Consultants and Council Civil Engineers

Action Notice Response

1 Landslide hazard Overlay Code

Landslide Hazard Overlay Code PO1, PO3 and PO5

The subject site is partially affected by the Moderate Landslide Hazard Overlay. Council acknowledges that the applicant has denoted that the landslide hazard overlay is not applicable given the majority of the proposed dwelling and associated works are not within the landslide hazard overlay.

However, the landslide overlay mapping is indicative and subject to confirmation - given part of the site is within a moderate landslide hazard zone, a perceived risk of a potential landslide hazard is still relevant to the proposed development.

Also, referring to the Bulk Earthworks Layout Plan (Specialist Reports, p.23) confirms that cut and fill works are proposed within mapped moderate landslide hazard land. Accordingly, the development is subject to the Landslide Hazard Overlay Code, and compliance has not been adequately demonstrated at the ROL stage.

The applicant is requested to provide a geotechnical report from a Registered Professional Engineer of Queensland (RPEQ) specialising in geotechnical engineering addressing the following issues in accordance with SC6.10 City Plan policy - Geotechnical stability assessment guidelines.

a) The report should provide a site-specific landslide risk assessment for the proposed development. The risk assessment should be based on surface and subsurface geotechnical information of the site. The report should demonstrate that the risk of landslide adversely affecting the subject site, adjoining properties and the proposed development is 'Low' or better. If the report determines the site with a 'Moderate' or worse risk rating, it should recommend appropriate and adequate risk mitigation measures to reduce the risk rating to 'Low' or better.
b) The report should include certification from a Registered Professional Engineer of Queensland (RPEQ) specialising in geotechnical engineering confirming that the proposed development is appropriate for the sloping nature of the site, and that the risk of landslide adversely affecting the subject site, adjoining properties and the proposed development is 'Low' or better; and
c) The report should provide a slope stability assessment for the proposed/constructed earthworks demonstrating achieving a long-term factor of safety of at least 1.5.

Response:

In response to Item 1, please refer to the Landslide Risk Assessment Report, prepared by PTG Consulting (**Attachment A**), where all items are addressed.

2 Healthy waters code

Overland flow paths – PO7, Flood Overlay Code, Overland flow – PO4, PO6

As per Council's database, the site has external catchments discharging as overland sheet flow through the site. Overland flow paths on the site must not be altered in a way that inhibits or alters the characteristics of existing overland flow on other properties or that creates an increase in flood damage on other properties. Changes to the overland flow paths may be permissible only when the applicant addresses the management of external flow within the overland flow path through the site to a lawful point of discharge without causing any adverse hydraulic impact to any external property during all standard rainfall events, ranging from a 63.2% AEP to a 1% AEP.

To demonstrate compliance, the applicant is required to submit a Hydraulic Impact Assessment (HIA) report. This report must show that there will be no adverse hydraulic impacts, increases in water levels, in line with Council's Flood Model Noise Practice Note.

The assessment should utilise an appropriate two-dimensional hydraulic model, such as TUFLOW, and must be conducted by a qualified professional engineer (RPEQ or equivalent) specialising in hydraulics.

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.

Response:

In response to Item 2, email correspondence between Legend Consultants and Council Civil Engineers has occurred regarding the external catchment of the site and associated modelling undertaken as part of the originating submission. As per the email correspondence, it is noted:

1 *Our pre development catchment extent goes to the Bonogin Creek. That is the "broader" catchment extent as the eastern boundary is the centre line of the creek. It has shifted over time and various cadastral searches also provide varying areas for the site due to this. The catchment does not extend beyond the site or the river centreline. Our pre development catchment plan C401 has its catchment extent shown on the plan. Where does Council see we have stated an extent beyond that on the same plan?*

2 *The Bonogin Creek cross section and flow characteristics remain completely unaltered by the proposed development, evident by both the post development catchment plans, the design contours provided and the civil plans submitted as part of the COM application. Refer plan C404.*

3 *We can therefore assure council that external flows into the site at the southeast (as previously stated) do flow through the site without obstruction or adverse redirection as a result of the proposed earthworks, roads, and lot layout. Please also refer the civil plans provided with the COM application. The SWMP plans also show the flood line through the site and that all works remain completely outside of this line thereby not affecting external flows or flood by the proposed works. Refer plan C404 for works extent and the existing flood extent on the site.*

4 *The DRAINS model confirms the proposed works within the site do not alter the discharge from the site so that flow at the LPOD remains in accordance with pre development conditions. We are not altering external flow through the site so there is no change to that either.*

5 *If council reviews the pre dev and post dev contours Council will see that there are two existing basins on the internal watercourse. The internal watercourse only conveys runoff from within the site and the two existing ponds form part of that existing path of conveyance. The proposed pond is to maintain the discharge function through what is existing ponds while providing one manageable basin asset for council. This is modelled in the DRAINS model and confirms, also within the SWMP provided, that the proposed basin does not: obstruct, redirect, or concentrate flows that currently discharge along the existing drainage line, nor adversely affect downstream conveyance and waterway stability. Since, it is essentially rehabilitation of an existing pond in the same location. As such this does not propose any alteration to a defined drainage line or waterway and ensures no adverse outcomes for the waterway or downstream properties. Again modelled in the DRAINS model and SWMP provided. Council's environmental section is assessing the proposed basin at the existing pond location. Maintaining the existing pond maintains the existing hydraulic function as well as the existing ecosystem there that has formed around the existing pond. Providing a new pond in another location would require more earthworks and clearing of vegetation at a low point thereby creating more environmental disturbance than utilising the existing pond.*

Further, it is noted that Council Civil Engineers have requested further information regarding elements relating to the proposed stormwater basin. It is considered that these items should be addressed as part of a formal Information Request.

As such, it is kindly requested a Confirmation Notice / Information Request be issued so any further matters can be addressed within the formal application.

If you have any questions, please do not hesitate to contact the office on (07) 3217 5800 or 0457 476 077.

Yours sincerely,
HPC Planning
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