

Date: 30 August 2018
Contact: Richard Webber
Location: City Development
Telephone: 07 55828680
Your reference: 202 Baileys Mountain Road
Our reference: MCU/2018/58

Sandson Pty Ltd
C/- Urban Planning Services Pty Ltd
PO BOX 2091
SUREFERS PARADISE QLD 4217

Dear Sir/Madam

Information Request

I refer to the development application lodged by:
Sandson Pty Ltd

in relation to development of land/premises described as:
Lot 58 SP191940 – 202 Baileys Mountain Road, 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.

Information Request

Preamble

The proposal provides clear non-compliances with the City Plan. The site is located in the Rural residential zone which seeks to 'provide low rise, very low intensity residential accommodation such as Dwelling houses and ...farm stays...'. The proposed development significantly conflicts with the Strategic Framework and the Overall Outcomes of the Rural Residential zone. Furthermore, the development is not of a scale or intensity that is akin to the surrounding area, nor does it appear to sufficiently protect adjoining amenity and future character of the area.

When assessing an application, the assessment benchmarks of the City Plan are to have significant weight in development assessment and ultimately play a determinative role in development assessment. When the proposal does not meet the assessment benchmarks, there is a need for compelling relevant matters to be presented in order to outweigh the non-compliance.

The applicant has requested that Council support the application despite the non-compliances based on other 'relevant matters', which, broadly speaking, relate to the investigations currently being undertaken by Council, the anticipated need and the site based investigations conducted by the applicant.

Officers do not currently consider the other relevant matters are sufficient to outweigh the non-compliances with the City Plan.

Given the severity of these concerns and the impact they could have on the officer's recommendation, the applicant is advised to attempt to address the Town Planning concerns before proceeding to address the other items contained within this Information Request.

Town Planning

1 Strategic framework and zone code

The current City Plan provisions do not support the proposed level of intensification of the subject site. The subject site is identified within the Strategic framework maps as the following:

- Strategic framework map 1 - designated urban area - Non-urban area (Investigation area) (not urban area as stated in the submitted planning report – refer to section 3.2.2 City Shape and urban transformation of the Strategic Framework);
- Strategic framework map 2 - settlement pattern – Rural residential areas; and
- Strategic framework map 4 - greenspace network - Hinterland core habitat.

The proposed development is considered to be out of sequence and premature development, as a draft amendment to City Plan for the Upper Coomera Investigation Area has not yet completed State interest review phase or been through the statutory public notification. The proposed development presents a significant departure from the current City Plan with a number of conflicts identified.

The application is considered to, among other aspects, conflict with the following statements within the Strategic framework and zone code:

Creating liveable places - Strategic Outcomes:

"Urban activity is contained within the City's urban area."

"Rural residential areas are very low intensity and low-rise environments with a semi-rural landscape character and protected natural features. They are not expanded.."

Creating liveable places - Element – Rural residential areas:

"(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.

Note: Some rural residential areas (conceptually shown on strategic framework map 1) will be investigated for land use opportunities and constraints. **Until these investigations are undertaken, and any amendments to the City Plan are completed, these areas are to maintain their rural residential character and intent.'**

Advice note

Please note the Urban neighbourhoods element is not applicable to the assessment of the application as the site is not located within an urban area. As such the uplift provisions to justify the building height do not apply.

Living with nature - Strategic outcomes:

"A comprehensive green space network of natural landscape areas is enhanced, maintained and protected for the nature conservation and recreation needs of the city and enhances the city's powerful image of green, gold and blue."

"Land, freshwater, estuarine and marine ecological processes and other matters of environmental significance are protected and supported through a connected green space network."

"Non-urban land is protected to maintain the extent and diversity of the city's natural and productive rural landscapes and define a hard edge to the city's urban area."

Green space network

"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."*

"Development does not erode, and, wherever practicable, contributes to, the expansion of the extent, function and values of the green space network."

"Development facilitates accessible, safe and integrated local open space networks that contribute to sense of place and quality of life."

Nature conservation

“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.”

“Biodiversity areas are fundamental elements of the city’s green space network. These areas are conserved to maintain the diversity of terrestrial, aquatic and marine species, ecosystems and ecological processes.

Mapped biodiversity areas include:

- (a) core habitats, that are extensive tracts of intact habitat within the hinterland and coastal wetlands areas; support a variety of vegetation associations; provide habitat for diverse fauna populations; and require the highest level of protection;
- (b) hinterland to coast critical corridors that link core habitat systems and isolated areas of biodiversity value by retaining existing vegetation and restoring degraded areas to enhance fauna movement between different ecosystems and landscapes; and
- (c) substantial remnants of intact areas of vegetation that retain and enhance the diversity, extent and condition of habitat by avoiding impacts that originate from their urban context.”

“The city’s matters of environmental significance include:

- (a) native vegetation of national, state or local significance;
- (b) coastal environments, wetlands and waterways;
- (c) core habitat areas and substantial remnants;
- (d) hinterland to coast critical corridors, including:
 - i. Burleigh Heads to Springbrook;
 - ii. Springbrook to Wongawallan;
 - iii. Southern Moreton Bay to Wongawallan;
 - iv. Southern Moreton Bay to Clagiraba;
 - v. Currumbin to Cobaki Broadwater (Tweed Shire); and
 - vi. Currumbin to Currumbin Valley.
- (e) habitat for threatened species, such as koalas.

“In biodiversity areas, matters of environmental significance including vegetation and habitat for native flora and fauna are protected in situ, and degraded areas are restored to improve habitat quality and connectivity.”

“Matters of environmental significance in the city’s nonurban area are protected from urban encroachment by containing urban activity within the city’s urban area.”

A safe, well designed city - Strategic outcomes:

- “(1) Areas of landscape character that contribute to the city’s unique landscape and built form are identified and protected.*
- (2) Important elements of urban character and community significance are protected and enhanced to strengthen the sense of identity in local areas and the city”*

Element – Landscape character

“The distinctive rural, semi-rural and natural character of the city’s river valleys, hinterland settlements, extensive natural landscape areas, rural production areas and rural residential areas provide a clear hard edge to, and natural backdrop setting for, the city’s urban area.”

Element – Urban design, character and community identity

“Development is cognisant of the function and desired future appearance of each individual area and reinforces or reinterprets the character of that area.”

Rural residential zone code

- (1) *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.*
- (2) *The purpose of the code will be achieved through the following overall outcomes:*
 - (a) *Land uses –*
 - (i) *support the rural lifestyle and amenity aspirations of residents residing in the semi-rural or bushland environment;*
 - (ii) *provide low rise, very low intensity residential accommodation such as Dwelling houses, and Short-term accommodation (farm stays);*
 - (b) *Character consists of –*
 - (i) *very low intensity and low rise environments; and*
 - (c) *Built form –*
 - (i) *is very low intensity, low rise and well setback from property boundaries to ensure privacy for adjacent residences and to preserve the very low intensity character of the zone;*

The applicant is advised that officers consider there are no relevant matters that have been provided which overcome the conflicts identified above, in addition to other non-compliances with the City Plan.

The applicant is strongly encouraged to place the application on hold, making use of the stopping the current period provisions, or withdraw the application **until such time that the relevant investigations are complete and included within the City Plan.**

2 Changed application

If the applicant wishes to continue with the current application, the applicant is requested to utilise the ‘stopping the current period’ provisions within section 32 of the *Development Assessment Rules* and/or request the applicant’s information request response period be extended, in accordance with section 13.1 of the *Development Assessment Rules*, **until such a time that the relevant investigations are complete and included within the City Plan.** The applicant is requested to make a changed application, in accordance with section 25 of the *Development Assessment Rules*, to reflect the major amendments to the City Plan, in relation to the Upper Coomera Area.

3 Relevant matters

Investigations

Officers acknowledge the relevant matters identified within the proposed application, however consider these matters to be incomplete and lacking supporting material.

Council have conceptually identified the subject site as an investigation area within the Strategic framework however it is clearly stated that until an investigation is undertaken, and

any amendments to the City Plan are completed, investigation areas are to maintain their character and intent.

The applicant has submitted site based investigations and specialist reports to support the proposed application however this supporting material does not consider or assessment of the broader context and constraints, of which Council's investigations do.

The subject investigation, being the Upper Coomera Area, is not complete and amendments have not been made to the City Plan. Thus until such time that this investigation is completed and amendments have been made to the City Plan the subject site is to maintain its rural residential character and intent.

The applicant is requested to identify any other 'relevant matters' pursuant to s45(5)(b) of the Planning Act 2016 that may be applicable in the assessment of this application or provide further supporting information for the relevant matters already identified.

Need

Given the relative sizes of the proposed elements and the ancillary nature of the Educational Establishment, it is fair to describe the proposed development as a Residential Care Facility or nursing home.

Subject to a more detailed scrutiny of the data contained within the Economic Needs Assessment (ENA), it appears that it has demonstrated that there is a market gap between demand for nursing home facilities and their supply, supporting the ENA's conclusion that there is an economic need for the proposed development. However, the ENA has not examined the extent to which appropriately zoned land exists that could accommodate the identified shortfall in supply. This is a major weakness of the ENA, preventing it from drawing a conclusion as to whether there is a planning need for the development to locate on the subject site.

It is noted that the proposed major use (Residential Care Facility) is Code Assessable in many zones: Low Density Residential (subject to criteria); Medium Density Residential; High Density Residential; Centre; Neighbourhood Centre; and Mixed Use (except Fringe Business Precinct). Officers consider that it would be easy to demonstrate that sufficient vacant and/or under-utilised lands were located within these zones within the large Catchment Area defined by the ENA.

It is acknowledged that there is an economic need for another Residential Care Facility to locate within the Catchment Area, but a planning need has not been demonstrated for it to locate on the subject site.

The applicant is requested to demonstrate a planning need, consistent with the Planning and Environment Court's previous determinations. This includes determining whether the proposed use could be located on a vacant or under-utilised site in a more appropriate zone elsewhere in the Catchment Area.

4 Scale and intensity of the use

The proposed built form, height, design and layout is not considered to maintain the existing amenity of the surrounding area nor support or complement the rural residential character. Officers have concerns with the proposed height, scale and intensity of the development not achieved the indented current and future character of the area. The applicant is requested to reduce the building height, scale and intensity of the building form to achieve a more appropriate low rise residential scale consistent with that sought by the zone code outcomes.

5 Building height

The proposed 3 storey (13m) building height is inconsistent with the area's low-rise character. It is requested that the building height be reviewed to provide a low-rise building in order to maintain the intended character of the area in accordance with:

- Specific Outcome 3 (3.3.7 Element – Rural residential)

- Specific Outcome 1 (3.8.3 Element – Urban design, character and community identity)
- Overall outcome 2(a)(ii), 2(b)(i) and 2(c)(i) of the Rural residential zone code.
- Performance criteria 4 of the Rural residential zone
- Performance criteria 3(a) of the Multiple Dwelling Code
- .Additionally, large vegetated buffers must be maintained to soften and screen the building.

In accordance with above provisions, the applicant is requested to demonstrate how the proposed height is considered to achieve the envisioned urban character of the local area being low rise and low intensity.

Advice note

The Urban neighbourhoods element is not applicable to the assessment of the application as the site is not located within an urban area. As such the uplift provisions to justify the building height is not applicable.

6 Development staging

The proposed development is intended to be constructed over two stages. It is requested that further information/drawings regarding the appearance and treatment of the development (i.e. building elevations, treatment to roof of car parking area etc.) at the completion of the first stage be provided to ensure that acceptable visual amenity is maintained in accordance with PO2 (General development provisions code).

7 Retaining walls

The applicant is requested to provide details of all retaining walls associated with the development including heights and materials.

8 Works within the Baileys Mountain road realignment

Once the realignment of Baileys Mountain is confirmed (refer to Transport assessment comments), the applicant is requested to amend plans to remove all embellishments and works associated with the development within this area.

Environmental Assessment

9 Amended site development plans required

The subject site is identified as containing two mapped waterways in accordance with the Environmental Significance Overlay Code. The applicant is proposing to retain and enhance Yaun Creek (stream order 4) crossing through the southern extent of the subject site. However, cumulative impacts to the waterway buffer have not been fully demonstrated. The applicant is proposing to retain the existing dwelling and construct a pedestrian linkage trail within the Yaun Creek buffer area. The submitted bushfire report recommends regular mowing and maintenance of landscaped areas for fire mitigation purposes. The bushfire report does not take into consideration rehabilitation of the Yaun Creek buffer area.

The submitted civil report identifies no proposed alteration or change to the eastern waterway (stream order 2) to facilitate the development. However, Preliminary Earthwork Plans identify cut and fill works to extend to the site's eastern boundary resulting in complete modification of the waterway. Further disturbance is demonstrated through the tree survey plans which identify trees along the banks of the waterway to be removed to facilitate the development. Additional tree clearing is proposed including the removal of four large Moreton Bay Fig trees located within the centre of the subject site.

The subject site currently facilitates a riparian / habitat corridor associated with Yaun Creek and north to the densely vegetated rural area identified as remnant vegetation (medium priority) containing koala habitat and local and state significant species. Previous developments

upstream and downstream of the site have secured conservation areas over the Yaun Creek corridor including extended corridors which capture the connecting tributaries from the north facilitating habitat connectivity.

The proposed development does not achieve compliance with performance outcomes PO5 and PO23 of the Environmental Significance Overlay code or demonstrate a development that is consistent with, and contributes to, the purpose of the code. The proposed development does not achieve adequate buffers to the mapped waterways which maintains bank stability and ensures unimpeded movement of fauna along the watercourse. The proposed development does not ensure the protection and enhancement of the ecologically significant areas and associated buffers to be suitably protected in perpetuity.

The proposed development does not achieve the strategic outcomes under Strategic Framework 3.7 Living with nature including specific outcomes under section 3.7.2 Element – Natural Landscape areas, and 3.7.4 Element – Nature conservation.

The applicant is requested to amend the proposed plan of development to demonstrate the following:

- a Provide adequate buffers to Yaun Creek and the connecting waterway (stream order 2) within the eastern extent of the site in accordance with the Environmental Significance Overlay Code and the Strategic Framework.
- b Demonstrate that no infrastructure and/or proposed earthworks encroach within the waterway buffer areas.
- c Demonstrate that no bushfire mitigation zones require impacts to the waterway buffer areas.

10 Rehabilitation Management Plan required

The applicant is requested to provide a rehabilitation management plan for the watercourse buffer areas to be dedicated as open space.

The rehabilitation management plan must be prepared in accordance with:

- a City Plan Policy 6.8 Environmental Management Plans
- b South East Queensland Ecological Restoration Framework 2012.
- c SC6.11 City Plan policy – Land development guidelines

The rehabilitation management plan must contain the following information (as applicable):

- d Details of proposed rehabilitation work including areas requiring Assisted Natural Regeneration, Reconstruction, and Fabrication.
- e Details of proposed staging of works.
- f Details of proposed rehabilitation works including proposed species and planting palette. The proposed planting palette is to include species consistent with Regional Ecosystems 12.3.11 and 12.11.24.
- g Planting modules to demonstrate planting densities.
- h All weeding works required, including a full list of known weeds on site and how each weed can be adequately managed.
- i The required ongoing management/maintenance regimes, including:
 - i All plantings to be subject to a 12 month establishment period;
 - ii Plans indicating maintenance areas/zones;

- i Schedules of works including frequency and tasks;
- ii Allocation of labour and resources to perform tasks;
- iii Nomination of key performance indicators/criteria for monitoring purposes (eg. All revegetation areas minimum 90% weed free, etc);
- iv Time allocated to perform various tasks (eg. top up mulch, pruning, topdressing, etc);
- v Defects liability for materials such as replacement of dead plant species of equivalent species and vigour to achieve 90% success rate;
- vi Coordination of services such as irrigation repair or civil infrastructure maintenance (such as stormwater) that may impact on the landscape establishment and maintenance periods;
- vii Management of bushfire hazard (only where appropriate);
- viii Management of domestic farm/feral animals (if appropriate);
- ix Tree management procedures;
- x Management and maintenance regimes for sediment and erosion control devices, and irrigation;
- xi Proposed future need for infrastructure, including public facilities; and
- xii Management and control of declared plants and recognised environmental weeds.

11 Amended tree retention / removal survey plan and arborist report

The applicant is request to amend Plans 4.1 and 4.2 *Tree Retention removal Plan – Baileys Mountain Road, Upper Coomera, Issue C, dated 31 July 2018 prepared by Saunders havill group*, to show the following:

- a Identify trees to be retained incorporated within the waterway buffer areas to be dedicated as public open space.
- b Identify trees to be retained over the balance of the site incorporated within the development layout.
- c Include a supporting Arborist Report for trees to be retained at the interface of site works and/or located in close proximity to proposed buildings. The report is to be prepared by a qualified Arborist with a minimum Australian Qualification Framework (AQF) Level 5 in Arboriculture and include the following information:
 - i. All tree management procedures within the report are to be in accordance with the Australian Standard AS4970 - 2009 *Protection of trees on development sites*;
 - ii. An appraisal of the health and vigour of the retained trees, including stage of growth, predicted gross morphology, crown framework and extent of root system;
 - iii. Tree site plan of suitable scale to proposed development layout plans indicating all required Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) for the retained trees.
 - iv. Details of all proposed vegetation works (including proposed clearing or retention works) to ensure the survival, ongoing health and vigour of retained vegetation (given proximity to buildings and areas where works are to be undertaken) including any necessary reductions (crown, thinning, root truncations) to accommodate footings and foundations, and protective devices (protective fences, root curtains/barriers) to minimise construction impacts.

Engineering and Hydraulic

12 Hydraulics and water quality Assessment

City officers have reviewed the stormwater report, titled "Site Based Stormwater Management Plan, Revision 02" dated 26 July 2018 prepare by Arcadis Australia Pacific Pty Ltd., submitted in support of the application. The applicant is requested to submit a revised report addressing the following issues:

- a. The building at the north-eastern corner appears to encroach in to the existing natural channel and the batters at the north-eastern boundary of the development appear to be too steep and the channel design / modification does not appear to comply with the design of an open channel. The applicant is requested to demonstrate that all the channels modified / designed as part of the current proposal comply with the requirements of a channel design as per the LDG and QUDM. Provide a number of sections along the length of the channel demonstrating compliant design.
- b. The afflux results claimed to be presented in Table 9-3 & Table 9-4 does not include the afflux information. The applicant is requested to include the information and demonstrate that the proposal will not increase the water level and velocity external to the site.
- c. Time of concentration for pre development catchment E (Ref: Table 7-2) has been considered as 5 minutes. We request the applicant to provide all assumptions and method calculate such short time of concentration for existing catchment. We envisage that considering the pre development / existing case catchment characteristics the time of concentration will be much longer than 5 minutes.
- d. Include the XP-Rafts parameters in the report
- e. Demonstrate that the bioretention basin design complies with the design requirements of City Plan – Land Development Guidelines. Please be advised that the LDG has not suggested different design criteria for privately owned and managed bioretention system. The design is required to be compliant with the LDG
- f. Provide adequate information on the boulder wall proposed as part of the bioretention basin. Be advised that Council do not accept any wall higher than 0.8m if that wall form part of the bioretention basin.
- g. Identify the maintenance access, to the bioretention basin, on plan and provide section. Demonstrate that the access design complies with Land Development guidelines
- h. Include pre and post development hydrographs at the lawful point of discharges demonstrating peak flow rates have been maintained for all events up to and including 100year ARI storms.
- i. Submit all modelling files for Council's review. Based on model parameter review, Council may issue Clarification request

Transport Planning

- 13 To comply with Part 3- Strategic Framework, section 3.6 Improving Transport outcomes- section 3.6.4 Element- Transport system efficiency-section 3.6.4.1(4) Specific outcomes, the applicant is requested to demonstrate that the proposed development does not compromise the function of the existing transport corridor through the site connecting to the existing roundabout (RAB) at Old Coach Road/Reserve Road. The City's Local Government Infrastructure Plan (LGIP) shows upgrade of this intersection is scheduled for 2026. Advice received from the City's Transport and Traffic Branch shows Baileys Mountain Road realigned through the site connecting into the above mentioned RAB. The submitted impact analysis, p.10 of 55, dated 26 July 2018 prepared by BDA, shows a 20m wide road reserve extending through the site to the roundabout which appears to be on a slightly different alignment to the drawing City's Transport and Traffic Branch have provided. The applicant is requested to update plans accordingly.

It is recommended a meeting be organised with relevant stakeholders to discuss this item.

- 14 To assist in demonstrating compliance with PO1 of the Transport code, the applicant is requested to further justify the proposed supply of car parking residents and visitors. The applicant proposes 8 resident spaces for the low care units and 44 visitor car parking spaces. Based on the traffic consultant's response, this appears to be based on the experience of the operator. In this regard, please provide some car parking survey data from existing similar retirement and residential care facilities under the same ownership to justify the proposed car parking supply.
- 15 To assist in demonstrating compliance with AO2 of the Transport code, the applicant is requested to remove the automatic sliding gate from the visitor car park. Alternatively, should the applicant wish to retain the gate, demonstrate how visitors will access the car parking area. It would be preferable to have the gate open during visiting hours or otherwise provide an intercom system linked to the administration area to provide access for visitors.
- 16 To assist in demonstrating compliance with PO5 and PO6 of the Transport code, the applicant is requested to demonstrate why a MRV is the largest design service vehicle. The main servicing requirements would be food and laundering services. It would be helpful if the applicant could provide letters from suppliers advising of their design vehicles. If the applicant proposes to maintain the MRV requirement, then a limiting condition will be applied.
- 17 The applicant has indicated that AO8 and AO9 of the Transport code are not applicable. This is not the case. To comply with AO8, new and existing educational establishments require integration of an off road public passenger transport facility. The application seeks approval for an educational establishment. The applicant is requested to provide justification against PO8 to address this matter.
- 18 To assist in demonstrating compliance with AO25.1 of the Transport code as proposed, the applicant is requested to update the proposed drawing set as follows:
 - a. Dimension all car parking and vehicle facilities to show compliance with AS2890.1, AS2890.2 and AS2890.6.
 - b. Submit a longitudinal section drawing along the full extent of ramp from Baileys Mountain Road entry to the furthest extent travelled by service vehicles showing compliance with the grade and transition requirements of AS2890.2.
 - c. Show a minimum of 3.5m vertical clearance into the undercroft car parking area to ensure suitable clearance to access the proposed SRV bay. All ceiling mounted services are to be located above this height.
 - d. Provide a longitudinal section along Baileys Mountain Road showing sight distance in both directions designed based on a 80km/hr (111m sight distance). Council has survey data from 8-14 May 2018 on Baileys Mountain Road between Old Coach Road and Courtney drive showing 85th percentile speed up to 76km/hr. This is required to comply with Figure 3.2, Note 4 of AS2890.1-2004.

Landscape Assessment

19 Planter boxes

Where trees are to be planted within planter boxes, these must have a minimum area of 6 square metres; the applicant is requested to ensure the plans demonstrate this is the case in this development.

20 Landscape internal garden bed design considerations

The applicant is requested to provide clarification on the following items concerning the development's landscape planting.

The Statement of Landscape Intent indicates areas of tree, shrub and screen planting within garden beds in between internal handstand. The applicant has not provided sufficient information of how these dense planting areas will be successful as visually demonstrated on

plans. The applicant is requested to demonstrate on amended landscape and architectural plans to how the landscape proposal provides appropriate and sufficient design considerations, concerning possible encroachments of services, service boxes and pipework (garage entry beds), soil space (deep rooting) and growing space. The long term success of these planting areas must be demonstrated.

Planting areas where trees are to be planted are requested to possess a minimum surface area of 6 square metres.

21 Bio Retention basin filter media depth

The storm water management plans are requested to be amended to show a filter media depth to allow screening shrub planting (minimum 700mm). A cross-sectional detail must identify the filter media depth (minimum 700mm). Increased screening shrub planting is required within the southern boundary Bio Basin to provide additional vertical visual and environmental amenity to the adjoining residential property.

22 Amended Statement of Landscape Intent

All changes to the site layout which occur as a result of this information request are requested to be reflected in an amended Statement of Landscape Intent.

Open Space Assessment

23 Trunk Park Infrastructure

In accordance with the Local Government Infrastructure Plan (LGIP) as contained in the City Plan (v5) the subject site triggers the LGIP for Trunk Park Infrastructure being:

- LL_046 - Old Coach Linkage 4 - Land & Embellishment for Recreation Linkage – 4,889 m²

The Environmental significance overlay code seeks to protect matters of environmental significance and is consistent with and contributes to the objectives of the Nature Conservation Strategy. Areas within the subject site triggered by the Environmental significance overlay have not been identified for protection through dedication to Council as public open space.

Having regard to item 9 of this request, the applicant is be requested to amend all relevant plans to show an area to be dedicated as public open space for conservation purposes. A recreation linkage is to be provided external to the area to be dedicated for conservation purposes. This area can be offset for recreation (Figure 2).



Figure 1: Environmental significance overlay mapping.



Figure 2: LL_046 - Old Coach Linkage 4 - Land & Embellishment for Recreation Linkage – 4,889 m²

24 Submit a Statement of Landscape Intent/Open Space Management Statement

- a The applicant is requested to submit a Statement of Landscape Intent (SLI)/ Open Space Management Statement (OSMS) to include the following:
- i Detail all areas to be dedicated as public open space for the following park types:
 - Conservation buffer to the mapped waterways adjacent to Baileys Mountain Road and Reserve Road;
 - Recreation Linkage (identified on Council's LGIP as Old Coach Linkage 4);
 - ii Demonstrate compliance of the recreation linkage with the Desired Standards of Service of Part 4 Local Government Infrastructure Plan of the City Plan;
 - iii Demonstrate how the conservation buffer and recreation linkage are integrated within the adjacent development footprint;
 - iv Include cross sectional elevations showing the grades of batter and associated heights at the interface with the development;
 - v Provide landscape treatment detail including embellishments (pathways) for all areas of public open space;
 - vi Include conceptual rehabilitation methodologies for the conservation buffer;
 - vii Provide maintenance access detail (bollards, gates and fencing) to all areas of public open space; and
 - viii The SLI/OSMS is to be prepared in accordance with the following City Plan Policies:
 - A SC6.11 – Land Development Guidelines; and
 - B SC6.12 – Landscape Work.

25 Amended plans

- a The applicant is requested to amend all relevant plans to show two separate park lots to be dedicated as public open space to Council being:
- i Conservation (Non-trunk);
 - ii Recreation linkage (Trunk infrastructure).
- b Provide area (m²) for each park type.

Advisory note

Buffer widths and areas are to be determined through the Ecological Assessment Report and Environmental Planning information request.

As this application was lodged electronically, please direct all future correspondence regarding this application in the required PDF format (ie)

- **Forms** (combine as one single PDF)
- **Supporting documents** (combine as one single PDF)
- **Plans** (combine as one single PDF)
- **Specialist reports** (combine as one single PDF)

The electronic response should be forwarded to mail@goldcoast.qld.gov.au

Contacting us

Should you wish to clarify any issues contained in this letter, please do not hesitate to contact Planning Assessment on 07 5582 8866.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Powell', written in a cursive style.

Andrew Powell
Supervising Planner
For the Chief Executive Officer
Council of the City of Gold Coast