

From: [Craig and Nelli Robertson](#)
To: [City of Gold Coast mail](#); [ALLEN Karl](#)
Subject: Your Ref COM/2019/82 Our Ref 91021172A Submission
Date: Tuesday, 10 December 2019 4:20:55 PM
Attachments: [Ref COM_2019_82 Our Ref 91021172A Objection Gallery Developments \(1\).pdf](#)

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To The Chief Executive Officer
City of Gold Coast
PO Box 5042 GCMC Qld 9749
Attn Mr Karl Allen

Good afternoon,

Your Ref Application Ref COM/2019/82 Our Ref 91021172A Submission

Please find attached PDF below with details of our objection.

Please don't hesitate to contact us by ph call or email for any further information.

Regards

Craig Robertson
Luke Rietschel

0408 287027
0477 404047

27 November 2019

To
The Chief Executive Officer
City of Gold Coast
PO Box 5042
GCMC QLD 9749
Email:
mail@goldcoast.qld.gov.au
kallen@goldcoast.qld.gov.au

Your Ref: COM/2019/82
Our Ref: 91021172A
Attention Mr. Karl Allen / whomever is responsible

**RE: FORMAL OBJECTION TO THE DEVELOPMENT APPLICATION (FOTTD A)
COM/2019/82 FOR A DEVELOPMENT PERMIT FOR A COMBINED MATERIAL
CHANGE OF USE & RECONFIGURATION
INCL. LOT'S 79, 89, 91, 97, & 99 COURTNEY DRIVE, UPPER COOMERA (LOTS
188-192 RP173728)**

As we have adjoining land to the above application we are therefore writing as the owners of the adjoining land being 94 96 98 Courtney Drive Upper Coomera (Lot 193 194 195 RP173728 respectively) to formally object to the DA **COM/2019/82.**
(FOTTD A) FORMAL OBJECTION TO THE DEVELOPMENT APPLICATION

We advise our objections (FOTTD A) to the subject application. **COM/2019/82**

Our objection is based on the following:

- Environmental Impact including Yaun Creek.
- Damage to proposed Nature Based Tourism facility. (YCHREETF)
- Lot sizes
- Yield
- Extension to Courtney Drive
- Lack of off-street parking
- Lack of recreational parkland

Yaun Creek, (including its source, the pristine spring fed tributary waters) is absolutely (and dangerously in environmental terms) too close in proximity to the proposed "high density" development. **COM/2019/82**

Apart from the Yaun Creek sensitivity in relation to the proposed development **COM/2019/82** there is naturally near such waters an abundance of wildlife in this environmental habitat at the head of the valley in Courtney Drive. The impact of the application **COM/2019/82** (and our FOTTD A) must be thoroughly investigated and carefully considered by CGCC person/s responsible.

The development DA **COM/2019/82** being proposed and applied for will not only adversely impact on the natural environment it will in its current form also dismiss our ability to carry out as per prior discussed plans with Council to develop our properties together within the concept of creating a nature- based tourism hub in our unique and ecologically important part of Courtney drive.

In fact, it now seems apparent, that the (high density) development **COM/2019/82** proposed which abuts the head of the valley including Yaun Creek and the border of our combined property will have a direct negative impact on but not limited to cultural heritage value, local ecosystem, attribution to the natural environment and all other aspects listed below. This will make it extremely hard/impossible to promote in terms of environmental awareness along with the idea of having conservation and a world class training education centre for students in native awareness and eco conservation as we have previously discussed to be incorporated with the nature- based retreat if a high-density development **COM/2019/82** proceeds practically on its doorstep.

We understand that CGCC has no strategic objection to and is keen to see Nature based tourism land use in the head of the valley which has YAUN CREEK flowing through it as CGCC is aware and made us aware there are the following benefits:

- good transport access to site
- existing cleared areas within an environmental setting
- close proximity to tourist attractions and other tourist accommodation (e.g. Ruffles Lodge)

It is understood that proposed land use will be impact assessed (requiring public notification) and assessment against the City Plan strategic framework. To this end we assume the Application and (FOTTTDA) will be assessed taking into consideration our proposal to develop a nature -based retreat and training centre for environmental protection with eco based accommodation and training facilities.

We note there is a development code which applies "Tourist Park Code". This code is designed for a wide range of tourist park type activities. In assessing the Application **COM/2019/82** and the objection (FOTTTDA) the proposal for an eco-development must be considered.

Our combined property concept:

"YAUN Creek Hillside Retreat Eco Educational Training Facility" (YCHREETF)

This has the components that Gold Coast City wishes to incorporate in its vision being to promote and provide facilities for Local, Interstate and International Tourism. The proximity to all facilities gives the Retreat attendees the ability to access and enjoy other areas of the Gold Coast, not just limited to the Natural Hinterland wonders but also covering other tourist attractions currently available now, such as the local theme parks Movie World, Wet and Wild, Dreamworld etc., only a few kilometers away and all others covered in the Gold Coast Future Tourism Plan.

Also there exists in close proximity existing Tourism Retreats namely: Peppers Ruffles Lodge and The Golden Door Retreat.

Regarding the environmentally important existing natural area with its eco system incorporating the thousands of years old Yaun creek running through the properties which supports important wildlife and has ecological implications.

Yaun creek holds significant value as a natural resource that carefully managed can be enjoyed by attendees who can also learn about the importance that these natural areas carry and how it must be preserved for future generations in a setting where development compliments that which already exists. This could become a model and also for other developments on the Gold Coast and indeed throughout Queensland. The scenic amenity from the highest point of Courtney Drive and the valley below through which YAUN Creek runs has already been identified by Gold Coast City Council as being valuable with aspects of significance in the Courtney Drive location. This is also identified in the draft concept plan for Courtney Drive dated March 2017.

“YAUN Creek Hillside Retreat Eco Educational Training Facility”

(YCHREETF) applies some of the several buildings located across the sites into a World Class training and Conferencing facility for study of Australian Native Wildlife and eco sustainability in a natural setting including wildlife studies photography environmental protection and conservation along with Cultural studies including History of Aboriginal cultural significance and Native Australian wildlife etc. In addition the facilities will be promoted for both R&R and motivational facilities along with eco accommodation for attendees in an eco based natural environment for organizations that are willing to support this type of facility.

City of Gold Coast Council on site visits and documentation in emails including correspondence from Planning division has addressed and supports our proposals.

To this end this parcel of land we believe is of significant value to the City of the Gold Coast and must not be disturbed from its current state through (on adjoining land) high density development **COM/2019/82** which would without doubt destroy many of the above positive points

Planning Assessment area in Council is responsible for assessing development applications. There are a number of detailed issues which need to be considered by Council for a development proposal for example:

- Vegetation clearing
- Bushfire management
- Services (water, sewerage, electricity, general waste, drainage)
- Access (e.g. driveways and visitor parking areas)
- **“Development interface” with adjacent properties**

It is the **“DEVELOPMENT INTERFACE”** (Proposed high density **COM/2019/82** DA) with our Adjacent properties as detailed above (including Ruffles Lodge) that we are most concerned about.

LOT SIZES :

We refer to Investigation Areas Programme – Courtney Drive, Upper Coomera Draft Report May 2017, Appendix C - Draft Concept Plan (Yield) dated 09-05-2017 which shows the subject area as a combination of Lot Sizes namely A1, A2, A3, and B1.

A1 being lot sizes generally 800-1000m²

A2 being lot sizes generally 600-799m²

A3 being lot sizes generally 600-799m²

B1 being lot sizes generally 400-599m²

The revised Plan of Development prepared by Bennett & Bennett Surveyors (page 370 of 539) in response to information request dated 06-11-2019, indicates lot sizes of:

328 – 450m ² approximately	159
451 - 601m ² approximately	38
602 – 750m ² approximately	7
751 - 900m ² approximately	12
> 900m ² approximately	4

	220

The Development Application is disproportionate to the draft concept plan.

Although we understand there is no hard and fast rule, it has been a long-standing practice that a transition between new and existing developments be provided to lessen the impact of the new development on existing subdivisions.

This would require those proposed lots abutting the existing subdivision facing Gordon Drive to be significantly increased in size.

This would also apply to those proposed lots abutting Lot 187 RP173728.

We note that the subdivision facing Gordon Drive which abuts Lot 187 RP173728 and the subject lots ie: 79 – 97 Courtney Drive were all initially proposed to be 600m² lots but were deemed Low Density Residential, Large Lot Precinct and altered to approximately 1000m² lots.

We refer to City Plan Interactive mapping – Version 7 (copy attached) and Conceptual Land Use Map 8 – Upper Coomera, incorporating lots 1-36 Balonne Court Upper Coomera. This land is zoned Emerging Community and has lots ranging from 622m² to 3653m².

This proposed Stockland subdivision is in the immediate vicinity of the subject site.

Other land shown on Conceptual Land Use Map 8 -Upper Coomera is zoned Rural and has lots ranging from 620m² to 2634m².

The size of lots in Gordon Drive and Balonne Court highlight the disproportionate nature of the subject application.

We refer also to Council's Precinct & Character statement (copy attached) contained in Appendix C – Draft Concept Plan.

This clearly demonstrates the preferred outcome in terms of:

- Proximity to existing residential neighbourhood
- Lot sizes (approx 600-1200m²)
- Negative visual impacts of large retaining walls

YIELD:

We refer to Investigation Areas Programme – Courtney Drive Upper Coomera Draft Report May 2017, Appendix C- Draft Concept Plan dated 09-05-2107 which defines the subject area as Suburban Neighbourhoods CSE1 and CW3.

The density estimate for these Suburban Neighbourhoods are:

CSE1 :- 9.7 to 13.3 dwellings / hectare

CW3 :- 8.4 to 10.9 dwellings / hectare

Item 16 of Our City Our Plan Supporting Documents – Urban expansion: Upper Coomera Investigation Area, Attachment 6 Upper Coomera Precinct Plan now shows the subject area as Sub-precincts CSE & CW.

We note in correspondence received by email October 18th from Amanda Tzannes referring to correspondence dated October 5th (which failed to email through), the residential densities to the subject area have changed.

The proposed densities are now :-

CSE :- 13 to 17 dwellings / hectare

CW :- 11 to 14 dwellings /hectare.

The subject application shows a Net Residential Density of 21.3 dwellings / hectare. This is far in excess of Council's preferred outcome.

EXTENSION TO COURTNEY DRIVE:

Reference is made to Investigation Areas Programme – Courtney Drive Upper Coomera Draft Report May 2017 – Draft land use & infrastructure concept plan.

Council has set out on pages 17 and 18, options A & B, (figures 4-6 & 4-7) for the extension of Courtney Drive and have deemed them not feasible.

The proposed option is shown on page 16, (figure 4-3) and whilst item 4.2.2 states that a Minor Residential Collector cross section is appropriate, it recommends the existing 20m road reserve be maintained.

The development application does not display a true continuation of Courtney Drive. The design does not accommodate the extension of Courtney Drive, but merely shows a local street connector meandering up to the existing road reserve adjacent the subject application to Reserve Road.

This will inhibit the flow of traffic from existing residences, and others, from Courtney Drive to Reserve Road.

There are approximately 42 lots accessing the proposed local street connector from Courtney Drive to Reserve Road.

The preferred option shown in Figure 4-3 would reduce this number by approximately 50%.

LACK OF OFF-STREET PARKING:

As is evident in other more recent developments, parking is a major issue with people being forced to park on footpaths, front lawns etc.

Off street parking areas will alleviate the pressure on local street connectors and provide a safer environment for residents.

MAIN SEWER LINE:

We understand that consent is **NOT** in place to traverse Lot 187 RP173728 with any services relating to this Development Application.

LACK OF RECREATIONAL PARKLAND:

The allocation of two areas for recreational parkland for a total area of 3563m².

This equates to only 3.5% of net area, which is totally inadequate.

The area of recreational park on Lot 56 RP162858 as shown on the Upper Coomera Precinct Plan is not accessible.

Recreational parkland has not been professionally or thoughtfully considered.

SUMMING UP and CONCLUSION:

We are not opposed to thoughtfully and professionally planned housing development and we all understand that the population is rapidly growing in the Gold Coast / Sth East Queensland region requiring development and facilities, however, there is also a shortage of reserves and in many developments lack of or inadequate recreational parkland.

Unfortunately there is also a lack of eco based tourism development such as planned for lots 193 194 and 195 and with Ruffles lodge in close proximity along with YAUN CREEK and its environmental importance all will be adversely affected and will/may fail if this development application DA **COM/2019/82** is to proceed. It is essential that development quality and suitability ensures the environmental impact on and values of the existing neighbourhoods in proximity are not adversely degraded but enhanced. The current (high density dwelling) application DA **COM/2019/82** does not reflect this and in fact is in direct contrast with the expected buffer zone that was to be provided for between rural /semi -rural and urban development.

Regards,

Craig Robertson and

Luke Rietschel

(Owners Lots 193 194 195 Courtney Drive)

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