

Date: 7 March 2023
Contact: Emily WALSH
Location: City Development
Telephone: 5582 8866
Your reference: 11241
Our reference: COM/2023/16

Coomera Ga Pty Ltd Atf The Coomera Ga Unit Trust
C/- Saunders Havill Group (Attn: Andrew McLean)
9 Thompson St
BOWEN HILLS QLD 4006

Dear Sir/Madam

Information Request

I refer to the development application lodged by:
Coomera Ga Pty Ltd Atf The Coomera Ga Unit Trust

in relation to development of land/premises described as:
Lot 96 RP187418 – 54 George Alexander Way, 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

A number of infrastructure and constraint based matters as raised within this Information request will necessitate changes to the development layout as currently proposed. Officers are happy to facilitate workshop discussions with the Applicant to further discuss the items below.

Planning Assessment

1. Site plan

The Applicant is requested to submit a site plan for the entirety of the subject site. The site plan is to clearly demonstrate the size of all proposed lots including the balance lot.

2. Retaining walls

As per the Engineering services plans prepared by Arcadis, the proposal will require retaining walls ranging from a single tiered wall 0.4-1.5m high to two tiered walls 1.5-3.0m high. To ensure all proposed retaining walls provide an appropriate interface, Officers will be recommending a specific condition requiring all retaining walls to be constructed of concrete sleepers (consistent with the plan set) with a dark grey colour with a split face, stone or wood pattern finish.

Note: As relevant to each Dual occupancy product, the built form must be responsive to the cumulative height of retaining walls and fencing.

3. Future small lots

The Applicant has proposed a number of small lots (lots less than 400m²) within the proposed development footprint. As per Performance outcome PO14(a) of the Reconfiguring a lot code, the Applicant is requested to provide a site plan for the construction of future Dwelling houses within the proposed small lots in accordance with the requirements of the Small lot housing code. Officers further note the narrow frontage of proposed Lot 5 (with a total width of 10 metres) as specifically identified in Item 4 below.

4. Narrow lots

Whilst the City Plan (Version 9) does not include an administrative definition for a narrow lot, Officers note that proposed Lot 5 includes a frontage width of 10 metres which is considered to demonstrate a narrow lot. All other allotments include a minimum frontage width of 12.5 metres. As per Performance outcome PO13 of the Reconfiguring a lot code, the Applicant is requested to demonstrate how the proposed 10 metre wide frontage of proposed Lot 5 provides space for public utilities and street trees as well as on-street parking. As per the plan titled 'Bulk earthworks cut and fill layout plan' prepared by Arcadis provided within the Engineering services report, the separation between the splays of the proposed VXO location of Lot 5 and Lot 6 only provides 6 metres which is not sufficient to accommodate on-street parking as per Performance outcome PO13. In demonstrating variation in dwelling form (PO13(a)), Officers will utilise the provided site plan in response to Item 3 above.

Note: Definitive location of on street infrastructure (gully pits, street trees, VXO's etc) must be identified for all lots and shown on submitted amended plans.

5. Overall lot layout

As identified in the preamble and the Information request items from internal stakeholders below; the proposed Reconfiguration of lot layout (and associated proposed works) presents a number of conflicts with the relevant provisions of the City Plan (Version 9). Notably, the development has not provided the identified LGIP recreational linkage along the eastern boundary of the site. Site based constraints (i.e. bushfire and environmental matters) will also influence the proposed development layout. The Applicant is requested to amend the overall lot layout to provide a development outcome which is responsive to all relevant provisions of City Plan (Version 9).

6. Staged development plan

The proposed development seeks to establish a new road providing connection from Pioneer Street to the north and through to the adjacent site to the south. The Applicant has not demonstrated how a waste collection vehicle could sufficiently turn around after servicing proposed Lot 7 and 8. To address this, the Applicant is required to include a staging component to the development which would delay the delivery of proposed Lot 7 and 8 and the associated portion of road in front of these lots until such time as the road connection through to the southern lot is delivered as well as submit a swept path analysis to demonstrate the movement of a Gold Coast Waste Collection Vehicle within the proposed development. This may be achieved by including proposed Lot 7 and 8 within Stage 1a.

Office of Architecture and Heritage

7. Development on corner lots

Officers note Proposed Lot 17 is designated as a Dual occupancy Lot (Type 3). Officers have concerns that the proposed built form and façade articulation of Building Type 3 does not suitably address the corner nor separate street edge, particularly to the south. The Building (Elevation 2, Type 3) presents an unarticulated mass to the corner and southern road frontage.

In order to assist in the protection of adjacent amenity and contribute to the streetscape character in accordance with PO3 of the Dual occupancy zone code, Officers recommend the following to current proposal or any future Dual occupancy dwelling:

- a. Providing improved visual interest to the corner through improved architectural expression and/or façade fenestrations to Elevation 4, on Building Type 3; or
- b. Mirror the plan arrangement to present the opposite side (Elevation 4) to the corner and southern edge.
- c. Fixed screening and privacy elements to promote passive surveillance and residential amenity outcomes.

Transport Assessment

8. Design of off-street parking facilities

To assist in demonstrating compliance with Required outcome RO12 of the Transport code, the Applicant is requested to:

- a. Provide amended drawings showing garage dimensions and dimensions of car parking spaces on driveways in accordance with AS2890.1:2004. This is to ensure that sufficient space is provided for each car parking space;
- b. Ensure that all car parking spaces are designed with a maximum gradient of 5% in accordance with section 2.4.6.1 of AS2890.1:2004. This needs to be annotated on the amended drawings;
- c. Where car parking is proposed on the driveways fronting the garages, show a design that allows access to each car parking space if the other driveway space is occupied;
- d. Where appropriate, show a vehicle swept path analysis generated using AutoTURN or similar specialised software package to demonstrate that a B85 vehicle can access the car parking space on Proposed Lots 11 and 17 when the other driveway space is occupied. A minimum clearance of 300mm must be shown around the vehicle at all times when manoeuvring to and from the car parking space;
- e. The laundry cupboards have been located in the garages in close proximity to the garage car parking space. Officers question the functionality of these laundries as there is minimal space in front of the laundry cupboard to stand, load/unload laundry etc. Furthermore, it appears that the laundries have been designed with doors that swing outwards. It is therefore concluded that the use of the laundries would require residents to move their vehicle, noting that the space identified for the vehicle is 5.4 metres long, being the

minimum required in accordance with AS2890.1:2004. The Applicant is therefore requested to relocate the laundries elsewhere within the dwelling, lengthen the garages to provide functional space in front of the laundry cupboards or amend the door type removing the requirement for doors to swing outwards.

Environmental Assessment

To achieve compliance with Performance outcome PO10, PO18 PO22, PO25 and PO26 of the Environmental significance overlay code, the Applicant is requested to address the following items.

9. Impacts to Medium priority vegetation

The proposed development contemplates the removal of all Medium priority vegetation mapped as occurring on the subject site.

The submitted *Ecological assessment report, prepared by Saunders Havill Group dated 3 February 2023*, states that removal of Medium priority vegetation will be undertaken in accordance with the Queensland Environmental Offset Policy by delivering a financial offset for the entirety of removal of state mapped koala habitat.

However, to comply with the Environmental significance overlay code, the Applicant is required to also pay offsets consistent with the *Environmental Offsets Act 2014*, at a ratio of 3:1 (area) in accordance with SC6.9 City Plan policy – Environmental offsets requirements, in addition to what is prescribed by the state as Medium priority vegetation is a different offsettable matter to koala habitat.

Furthermore, the Environmental Offsets Act 2014 framework requires that impacts are addressed in a hierarchy of first being avoided, then mitigated before any significant residual impacts are offset as a final consideration.

Offsetting all mapped Medium priority vegetation does not adequately avoid or mitigate impacts in the first instance before offsets are proposed. As such, the application does not satisfactorily meet Environmental Offsets Act 2014 requirements.

This proposed approach conflicts with the following City Plan 2016 assessment benchmarks:

- Environmental significance overlay code Overall outcomes 2(d)(ii), (h); and
- Environmental significance overlay code Performance outcome PO10 and Acceptable outcome 10

As such, the Applicant is requested to:

- a. Prepare and submit amended plans which reduce the development footprint to retain a significantly higher portion of medium priority vegetation. All bushfire management measures should also be located outside of these additionally retained areas; and
- b. Calculate offsets for any significant residual impact for Medium priority vegetation additional to that required to be paid for removal of koala habitat.

10. Covenant and Rehabilitation Management Plan

The proposed development represents significant impacts to mapped Medium priority vegetation and habitat for priority species on the Environmental significance overlay code maps in addition to state-mapped core koala habitat. To achieve compliance with Environmental significance overlay code Purpose 8.2.6 2 (b) and (e) and Performance outcomes PO23, 25 and 26 of the Environmental significance overlay code, the Applicant is requested to nominate the eastern portion of the subject site to be dedicated as a statutory covenant. The Applicant is also requested to prepare and submit a rehabilitation strategy for the covenant area, prepared in accordance with the South East Queensland Restoration Framework and Schedule 6.8 City Plan Policy – Environmental management plans.

Note: This is a matter Officers are happy to workshop and discuss further with the Applicant.

Bushfire Assessment

11. Amended Plans

The Applicant is requested to submit an amended Bushfire Management Plan (BMP) that is in accordance with the City Plan Policy – SC6.3 Bushfire Management Plans.

The submitted Bushfire Management Plan being *Bushfire mitigation report by Eldon Bottcher Architect PTD LTD, dated 07 February 2023* is requested to be amended as follows:

- a. Review the calculations for Method 2. An FDI of 40 was used which is the FDI appropriate for Method 1. The Bushfire Resilient Communities Technical Reference Guide- Section 7.3 Item 2 states that Method 2 of AS 3959-2018 subject to the adoption of site-specific values of FFDI. Whilst Section 5.4.1.1 states the FFDI value of 40, adopted in Method 1 should not be used as it fails to consider regional differences in weather severity that might not be expected for the 5% AEP fire weather event. It is requested the bushfire management plan calculations are based off one methodology only, either Method 1 or Method 2 without combining the two. The bushfire management radiant heat flux calculations are requested to be updated reflecting the use of one method only;
- b. Acceptable outcome AO6 and Performance outcome PO6 of the Bushfire hazard overlay code require a perimeter road for firefighting purposes. The Applicant is requested to provide a perimeter road or address how adequate firefighting will occur on lots 8, 13, 14, 15 and 16;
- c. The Applicant is requested to address how Proposed Lots 8, 13, 14, 15 and 16 achieve an acceptable or tolerable bushfire risk when they are to be constructed to a radiant heat flux greater than 40kw/m²;
- d. A pedestrian fire trail is proposed to be located on the lot south of the proposed development site identified on drawing titled "Emergency Management Plan" number SK-2.0 dated 03/02/2023. This lot has not been included in the development application. It is requested that all fire trails are to be located within the subject lot; and
- e. Amend the submitted Bushfire management plan to reflect the information request items submitted by Environmental assessment officers such as required vegetation retained for a covenant area.

12. Bushfire Overlay Code Response

The Applicant is requested to prepare a response to the Bushfire hazard overlay code as an appendix to the Bushfire management plan identifying how overlay code outcomes have been achieved.

Open Space Assessment

13. Amended Statement of Landscape Intent

The applicant is requested to amend the *Statement of Landscape Intent titled: Landscape Concept Plan – 54 George Alexander Way Coomera, dated February 2023, Issue C, prepared by Saunders Havill Group* to include the following:

- a. Reflect Council's LGIP Recreation Facilities network owner Parks and Recreational Services information request for the inclusion of LL_011 Recreation Linkage Local Park generally in alignment with City Plan LGIP 1 designation. The linkage is to be approximately 35m wide, extending the full length of the eastern side of the subject site. The total park area is to be approximately 3,395m²;
- b. Include the following embellishments within the recreational linkage park:
 - i. 2.5m wide shared pathway for recreational walking, low-speed cycling and other wheeled devices meandering through the park;
 - ii. Park furniture - signage, bollards, park maintenance access gate;
 - iii. Seating at intervals throughout the recreation linkage;
 - iv. New shade trees or incorporate existing trees where possible; and
 - v. Provide road frontage to the full extent of the recreation linkage in accordance with Performance outcome PO21(e) of the Reconfiguring of a lot code of the City Plan.

- c. Provide two (2) cross sections at 50m intervals of the interface of the public parks, road and private lots showing batter grades and any retaining infrastructure. Note all retaining walls are to be wholly contained with private lots and not within public open space or road reserve;
- d. All batters and any stormwater infrastructure associated with the proposed Drainage Reserve are to be wholly located out of the Recreation Linkage;
- e. The Recreation Linkage is to be designed and constructed for the purposes of recreation in accordance with LGIP desired standards of service and additional advice from the network owner.

14. Amended Proposal Plan and Plan of Development

The Applicant is requested to amend the *Proposal Plan and Plan of Development*, dated 1/02/2023, Rev B, prepared by Saunders Havill Group to include the following:

- a. Detail two (2) separate park lots being for Recreation (Trunk) Linkage 3,395m² and Drainage purposes;
- b. The Recreation Linkage Park is to be approximately 35m wide, extending the full length of the eastern side of the subject site in accordance with City Plan LGIP designation;
- c. The drainage reserve is to be located wholly outside and external to the recreation linkage park; and
- d. Identify the timing (staging) for dedication of each park.

Parks And Recreational Services

15. Amended plans

Submit amended plans that identify the necessary trunk infrastructure pursuant to the Local Government Infrastructure Plan (LGIP) for the Parks and Land for Community Facilities network - LL_011 Recreation Linkage Local Park Land and Embellishments in accordance with the Desired Standard of Service for the Parks Network.

The mapped recreational linkage extends to the adjacent site to the north and south. Officers acknowledge that the adjacent northern development did not deliver this linkage however, at the time of assessing that application, there was no LGIP designation over Lot 1 Talpa Street. LGIP mapping has been updated to reflect the increased residential density delivered within the immediate locality and addresses the lack of existing and approved recreational spaces within the immediate locality.

16. Bill of quantities

Submit a 'Bill of Quantities' listing all proposed embellishments and associated costs.

It is noted that the offset for land and works identified in LGIP1 is \$481,054.57 - land \$287,205.60 for embellishments \$193,848.97.

Landscape Assessment

17. Amended plans

In order for the proposed Dual Occupancies to demonstrate compliance with Performance outcome PO1 and PO2 of the Medium density and High density residential zone codes, and provide adequate landscaping adjacent to the road frontage in accordance with Performance outcome PO1 of the Dual occupancy code, the Applicant is requested to submit amended plans that show the addition of two frontage deep planting garden areas, for each proposed Dual occupancy, which are 6m² in area, with a minimum dimension of 1.5m and positioned so a canopy tree can be planted 3m clear of any built form. These garden areas are to be clearly marked and colour coded on the site plan for each Dual occupancy type.

Subdivision Engineering

18. Safe Intersection Sight Distance (SISD)

Proposed Longitudinal Section for Pioneer Street and Mercy Street shows that Chainage 72.054 will be a crest section of proposed extension of Pioneer Street within the site. Proposed intersection of Pioneer Street and Mercy Street (adjacent to proposed Lot 12) will be a sag section of proposed extension of Pioneer Street. Separation between proposed crest section and proposed intersection is 47.99m. However, the submitted Traffic Engineering Report does not include information of Safe Intersection Safe Distance for proposed intersection. Hence, the application package does not comply with AO15 (a) of the Reconfiguring a lot code.

In order to comply with Acceptable outcome AO15 (a) and Performance outcome PO15 of the Reconfiguring a lot code, the Applicant is requested to submit an amended Traffic Engineering Report including:

- a. Information of Safe Intersection Sight Distance in accordance with the requirements of section 3.2.2 of Guide to Road Design Part 4A – Unsignalised and Signalised Intersections Austroads (published 2021); and
- b. Design speed should be 50km/h.

It should be noted that if the location of the proposed intersection cannot achieve the requirements of the SISD, then the Applicant is required to submit an alternative road layout for extension of Mercy Street which is reflected on amended proposal plan to reflect any changes.

19. On-street parking space

Proposed Site Plan shows that both proposed VXOs for proposed Dual occupancy Lots 14 and 15 at the kerb line will have less than (minimum) 7m separation. Less than 7m separation does not fully function as on-street parking space. Hence, the proposed VXOs of Lot 14 and 15 do not comply with the requirements of the Purposes of Overall Outcome (9.4.8.2 (2)(a)(ii)) and PO13(c) of the Reconfiguring a lot code.

In order to comply with the Purposes of Overall Outcome (9.4.8.2 (2) (a) (ii)) and Performance outcome PO13 (c) of the Reconfiguring a lot code, the Applicant is requested to provide an amended Site Plan showing:

- a. Full dimensions of proposed VXOs; and
- b. A (minimum) 7m separation at the kerb line between 2 proposed VXOs.

20. Safe and efficient vehicle access for proposed Lot 17

Proposed Site Plan shows that proposed VXO for proposed Dual occupancy Lot 17 will be encroached into the 6m vehicle crossing prohibited location (refer to standard drawing RS-049). According to Table 2.1 (Transport network standards) of the SC6.11 City Plan policy – Land development guidelines, Section 2.4.26 references to comply with standard drawing RS-049. Hence, location of proposed VXO for proposed Lot 17 does not comply with Acceptable outcome AO3.

In order to demonstrate compliance with Performance outcome PO3 of the Reconfiguring a lot code, the Applicant is requested to provide a certificate from a RPEQ specialising in traffic engineering to confirm that location of proposed VXO for proposed Lot 17 does comply with the requirements of PO3 (i.e. safe and efficient access for vehicles). If the location of the proposed VXO for proposed Lot 17 cannot be certified by the RPEQ, then an alternative location of proposed VXO should be shown on the amended Site Plan and a certificate from the RPEQ to certify that the alternative location does comply with the requirements of PO3.

21. Appropriate clearances between proposed VXOs and proposed Council's infrastructure

Proposed Site Plan shows proposed VXOs, gully pits, pram ramps and footpaths. However, proposed VXOs do not provide the (minimum) 1m clearance from proposed gully pits and pram ramps. The Applicant is required to submit an amended Site Plan showing full dimension of:

- a. Proposed VXOs, gully pits and pram ramps; and
- b. The (minimum) 1m clearance at the kerb line shall be provided between proposed VXOs and proposed Council's infrastructure (i.e. gully pits and pram ramps).

22. Access to George Alexander Way

As per the Decision notice for the approved Variation request at 66 George Alexander Way, Coomera (adjacent site to the north)(MCU/2018/10), Condition 4 identifies that access to George Alexander Way is limited to a single access point for Lot 95, 96 and 97 on RP187418. This includes the subject site. As such, all future access to George Alexander Way from the balance lot (proposed lot 900) will need to be facilitated through the adjacent site to the north. At this stage, the City is unsure as to when the road upgrades to George Alexander Way will be delivered.

As a result of the restricted access, all traffic associated with the proposed Reconfiguration of a lot requires future residents to travel along Pioneer Street and Mercy Street to the north to achieve access to Talpa Street and ultimately to connect through to Finnegan Way.

As per Performance outcome PO2 of the General development provisions code, the Applicant is required to submit a Traffic impact assessment to demonstrate the potential impact additional traffic generated by the proposed development may have on the existing road network.

The details associated with the Traffic impact assessment can be further discussed.

Hydraulics And Water Quality

23. Healthy waters code & General development provisions code

With regard to the provided Conceptual Stormwater Management Plan by Biome Water & Environmental Consulting (V1), Officers request the following information in accordance with the relevant assessment benchmarks of the Healthy waters code and General development provisions code:

- a. Provide MUSIC and XPSTORM modelling files for Council's record keeping and verification purposes;
- b. Connect the bioretention basin outlet pipe to Pit 2; and
- c. Officers question whether a sag pit is required on the western side of the low point on Pioneer Street. As such further clarification on this element is requested.

Note: The provided Conceptual Stormwater Management Plan by Biome Water & Environmental Consulting (V1) shows overflow weir for the combined bioretention/detention basin discharges to the Bridle Trail Park Reserve to the east. Officers do not support discharging weir overflow to Lot 95 on RP187418 and the Applicant must submit an amended Conceptual Stormwater Management Plan reflecting an alternative outcome.

Water and waste

24. Submission of additional information

At this stage, Water and waste are still reviewing the proposed development application. Additional information from Waste and waste may be requested and if required, will follow in a separate piece of correspondence.

RESPONSE FORMAT

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 with the Assessment manager CC'd in (Emily Walsh)

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 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.

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



Emily Walsh

Senior Planner (North)

For the Chief Executive Officer

Council of the City of Gold Coast