

6 May 2020

Our Reference: 462

Council File Reference: MCU19/0114 & RAL19/0027

Noosa Council

Attention: Patrick Murphy

BY EMAIL TRANSMISSION

mail@noosa.qld.gov.au

Dear Patrick,

RE: RESPONSE TO INFORMATION REQUEST
Development Application MCU19/0114 & RAL19/0027
30, 114, 122 and 144 Myall St Cooroy Qld 4563
(Lot 33 MCH 2281 and Lots 1, 2 and 3 on SP 115864)

I refer to Council's Information Request dated 18 October 2019 issued in respect of the above application. Each of Council's request items have been set out and responded to below. Extensions to the information request response period granted by Council are also acknowledged and appreciated. These extensions have afforded the applicant sufficient time to compile a well-considered response package that comprehensively addresses the matters raised by Council. The following supporting information is enclosed with this response.

Attachment 1	Architectural Plan Series
Attachment 2	Golf Course Design Master Plan
Attachment 3	Golf Clubhouse Design Plans
Attachment 4	Boundary Realignment Plan
Attachment 5	Visual Amenity Analysis
Attachment 6	Landscape Concept Plans
Attachment 7	Acoustic Report
Attachment 8	Traffic Response items
Attachment 9	Ecological Response
Attachment 10	Ecological Assessment Report
Attachment 11	Ecological Riparian Buffer Assessment
Attachment 12	Westera Response Letter
Attachment 13	Westera Engineering Drawings
Attachment 14	Westera Flood Report
Attachment 15	Westera Stormwater Management Plan
Attachment 16	Example Site Agreement

1. Community Benefits

Prior to responding in detail to each of the request items we take the opportunity to re-emphasise the community benefits that will ensue from the approval of this development application as follows:

1. **Supporting the viability of an important community sports club (the Cooroy Golf Club)** – The Cooroy Golf Club is an important community use which has been experiencing financial hardship as a result of a declining membership base.

GemLife agree to be bound by an Infrastructure Agreement that will deliver a number of financial and social benefits to the Cooroy Golf Club in an effort to make sure the club stays viable into the future. A summary of these committed benefits is provided below:

- a) **Guaranteed membership boost** – Guaranteeing 1 golf membership per new dwelling in the GemLife resort for a period of 10 years.
- b) **New clubhouse facilities** – Construction and fitout of a new golf clubhouse with a dedicated pro shop, restaurant, café, function room, outdoor deck and terrace area. This clubhouse has been designed to accommodate weddings and functions so that the club will have the ability to generate supplementary income from such events (in addition to golf course activities).
- c) **New and safer access** – Safer vehicle access to the golf course and clubhouse via a new private road and associated access rights. This is a significant improvement upon the existing access and car park from Myall Street.
- d) **New and larger car park** – A new car park with 97 dedicated car spaces to cater for patrons of the golf course and clubhouse (significantly more than the current car park capacity).
- e) **New golf buggy storage facilities** – A new golf buggy storage shed with space for the permanent storage of 40 carts.
- f) **Modifications to golf course** – Reconfiguring the golf course to maintain 18 holes whilst accommodating a newly re-located club house, car park and associated access.

2. **Promoting synergy between the golf course and GemLife retirement resort** – GemLife are committed to promoting a genuine synergy between the Golf Club and the retirement resort. The benefits of co-locating retirement living with other land uses is well documented as being a positive impetus for social interaction and inclusion. The GemLife community will result in a population of around 500 people on the doorstep of the golf club, many of whom will take advantage of their included membership by taking up the sport or taking advantage of the

dining / leisure opportunities available in the clubhouse. GemLife is optimistic that this development will re-enliven the club's membership base and result in improved social opportunities for both Golf Club members and GemLife Residents.

- 3. Responds to the need for age specific housing** – The need to provide housing for an ageing population within the shire is well documented; in particular, by the Housing Needs Assessment prepared by Briggs and Mortar for Noosa Council in 2017. This report identified a need for additional retirement dwellings (particularly smaller and more affordable dwellings) to be provided within the shire to meet the needs of an ageing population. The proposed development stands to provide a direct response to this housing need by delivering 246 retirement living (resort style) dwellings with access to complementary whole of life 'ageing in place' services to cater for residents of Cooroy and the surrounding area.

It is noted that land opposite the site at 125 Myall Street, Cooroy (Lot 4 SP248479) is proposed to be zoned 'Community Facilities' for a Residential Care Facility under the new Draft Scheme. We consider the proposed re-zoning of 125 Myall Street to an urban zoning is a sensible planning decision as it represents a logical continuation of urban development existing further to the north e. However, we consider that designation of the whole site for aged care purposes does not make practical sense as an aged care facility only requires around 6000-8000sqm of land area whereas the site is 6.665 hectares in size and a large balance area would be left over with no certain land use outcomes.

The proposed GemLife site is considered more appropriate to deliver the retirement / ageing in place services intended by the housing needs assessment due to the co-location benefits stemming its co-location next to the complementary land use activity (i.e. the golf course) and 125 Myall Street, would be more appropriately located in a conventional urban zoning.

- 4. Ageing in place services offered** – The proposed development will deliver an ageing in place solution by virtue of GemLife's partnership with Prescare who are a not for profit provider of aged care support services. Residents of the Cooroy GemLife community will have access to the services offered by Prescare which include: in home care, in home nursing, assisted shopping, transport to appointments and social events, rehabilitation and physical therapy, respite care, dementia services, pastoral and spiritual care, food and meal services, mobility equipment. This partnership between Prescare and GemLife is significant as it provides an ageing in place solution that will allow residents to be accommodated in their homes within the GemLife community for a much longer time before the possibility of having to transition into high care. Therefore, whilst the proposal is not for a high care facility, it does deliver retirement living with ageing in place solutions which are needed in the Cooroy area.
- 5. Assist in maintaining viability of township services** – The retention of this segment of the population within Cooroy assists in ensuring the ongoing viability of services and facilities in Cooroy (such as local shops, community uses and medical services). Ensuring a critical population mass within the Cooroy township means that there is less risk of key community, retail and medical services being re-located to larger centres.

6. **Employment generation** – The proposed development stands to provide economic stimulus for the Cooroy township by stimulating employment during construction and providing employment opportunities during the ongoing operation of the facility (such as on site management, grounds keeping and cleaning). This is considered to be an even more pertinent consideration in light of the current economic turmoil created by COVID-19 and the developer is committed to commencing the development as soon as approvals are obtained.

2. Minor changes to application as a result of response to information request

There have been some minor changes to the application as a result of responding to the information request, wherein changes to the site layout to accommodate an increased landscape buffer have been made in response to the matters raised in the information request. These layout changes have resulted in a minor increase to the GemLife site area from 10.56 ha to 11.08 ha, with some consequential shuffling of the layout resulting in a change to the number of dwellings to 246. We request that this change be noted in any application material moving forward.

3. Response to each item raised in information request dated 18 October 2019

We respond in detail to each of the Council's individual information request items as follows:

Item 1 – The application amended to properly reflect all uses which are proposed to occur as a result the development.

Response – The proposed development application seeks Development Permits for the following aspects:

- Material Change of Use of Premise for Multiple Housing (Type 5 - Relocatable) – 246 dwellings
- Material Change of Use of Premise for Entertainment and Dining Business (Type 2 - Recreation, Amusement and Fitness);
- Reconfiguration of a Lot (Boundary re-alignment and access easement).

The new golf clubhouse has been applied for as 'Entertainment and Dining Business (Type 2 – Recreation, Amusement and Fitness) as the operational functions will include entertainment and dining uses, and we note that the definition for 'Open Space – Type 1 Sport and recreation' specifically excludes such uses occurring within a clubhouse. The Entertainment and Dining Business (Type 2 – Recreation, Amusement and Fitness) land use was chosen over the Open space - Type 1 Sport and Recreation land use as the clubhouse is associated with a recreational and sporting activity, being golf. The Open Space – Type 1 Sport and Recreation land use definition was considered to not appropriately capture the full range activities anticipated to occur within the clubhouse, which we note will include the sale of food and beverage.

The clubhouse associated with the residential component of the proposed development (i.e. the Multiple Housing – Type 5 Relocatable) along with the sales centre, managers residence, recreational facilities and workshop are all classified as ancillary uses to that of the retirement

resort. The multiple housing 'Type 5 Relocatable' land use has been applied for over 'Type 3 Retirement and special needs' in light of the administrative definitions of the Noosa Plan 2006, which provides that a retirement village must operate under a retirement village scheme (pursuant to the *Retirement Villages Act 1999*). The GemLife model operates under the *Manufactured Homes (Residential Parks) Act 2003* and therefore legally cannot apply for the Type 3 land use under the planning scheme.

Item 2 – Clarification of the tenure arrangement for the occupiers of the proposed relocatable dwellings.

Response – The proposed GemLife community will operate under the *Manufactured Homes (Residential Parks) Act 2003*. To put the arrangements in simple terms, the resident owns the house (which is capable of being moved / relocated) and the operator owns the land underneath. Site rent is paid to the operator by the homeowner to have the dwelling on the land and to cover the cost of utilities and other outgoings (such as rates, water, maintenance of lawns and communal facilities). An example site agreement is provided at **Attachment 16** to provide greater clarity regarding the proposed arrangements.

Item 3 – If the tenure arrangement is for a lease in excess of 10 years clarification as to why the application does not seek approval for the reconfiguration associated with these leases.

Response – We note that there are a significant number of retirement communities operating under the *Manufactured Homes (Residential Parks) Act 2003* across Queensland, the Sunshine Coast and in the local area. We are not aware of a single example of one of these communities where a Reconfiguration of a Lot approval has been required. As an immediate example we would point to the existing Palm Lake Resort at 19 Trading Post Road, Cooroy which operates under the same legislation. We suggest that this is due to the fact that the site agreement signed by the homeowner and the park owner is not required to specify a term, with each party retaining the right to terminate the agreement at any time in accordance with the provisions of the *Manufactured Homes (Residential Parks) Act 2003*.

Item 4 – Demonstrate how the proposed dwellings provide for aged care as per the need identified in the Housing Needs Analysis including details of any external service provider would provide care and the level of care provided (i.e. high care)

Response – As outlined in Section 1. Community Benefits analysis of this correspondence, the proposed development anticipates delivering an ageing in place solution by virtue of GemLife's partnership with Prescare who are a not for profit provider of aged care support services. Residents of the Cooroy GemLife community will have access to the services offered by Prescare which include: in home care, in home nursing, assisted shopping, transport to appointments and social events, rehabilitation and physical therapy, respite care, dementia services, pastoral and spiritual care, food and meal services, mobility equipment. This partnership between Prescare and GemLife provides an ageing in place solution that will allow residents to be accommodated in their homes within the GemLife community for a much longer time before the possibility of having to

transition into high care. Therefore, whilst the proposal is not for a high care facility, it does deliver retirement living with ageing in place (high care) solutions that are envisaged by the Housing Needs Analysis.

Item 5 – Demonstrate how the proposed dwellings are able to be certified by a private building certifier as relocatable.

Response – The GemLife model is predicated on the delivery of a specialised dwelling design that meets the manufactured home (i.e. relocatable) criteria of the *Manufactured Homes (Residential Parks) Act 2003* which provides that the dwelling design:

- (a) has the character of a dwelling house; and*
- (b) is designed to be able to be moved from one position to another; and*
- (c) is not permanently attached to the land.*

To explain the specialised dwelling design implemented by GemLife in very basic terms, a concrete slab is laid, a frame is positioned on top of the slab and then the house is constructed on the frame with appropriate supports and fastenings. In the event that the dwelling has to be re-located it can be split into sections, jacked up and placed on a vehicle for transport.

Item 6 – Review the built form of the proposal so that it accords with the prevailing character of Cooroy.

Response – The colour scheme and building designs adopted by the proposed development have been chosen to ensure they are respectful to the town character of Cooroy. The house design plans included with the Architectural Plan Series at **Attachment 1** show a variety of traditional roof form options including hip, gable and dutch gable roof types as well as a neutral colour scheme which ensure the development will not be visually dominant in its surroundings. A Visual Amenity Report has been prepared which discusses the proposed development and its suitability in the context of its surrounds. This report is included at **Attachment 5** to this report.

Item 7 – The form of surety proposed to ensure that this will occur. If the proposed mechanism is an Infrastructure Agreement a copy of the agreement should be provided.

Response – The applicant has prepared an Infrastructure Agreement setting out the deliverables agreed between GemLife and the Golf Club to provide Council with the surety required that these benefits will be delivered. Council will be provided a copy of this agreement under separate cover and the applicant is willing to execute this agreement prior to a development approval being issued.

Item 8 – Demonstrate how the tree lined access to Cooroy be provided, this is likely to require an increased setback to fencing and buildings and increase the landscaping between the front property boundary and these structures.

Response – As reflected in the updated Proposal Plans at **Attachment 1** and Landscape Concept Plans at **Attachment 6**, the development layout has been amended to provide an increased front boundary setback between the dwellings and Myall Street. A 10m landscape amenity buffer along the sites frontage will be densely planted with fast growing native trees and plant species and will contribute to the tree lined entrance of Cooroy.

Item 9 – Clarify how the clubhouse, including the dining and function facilities, are to operate.

This information should include, but not be limited to:

i. Potential users, including numbers;

ii. Hours of operation; and

iii. Regularity of functions;

Response – The Golf Club has been consulted regarding this matter, however the frequency of events, hours of operation and number of users is not possible to predict until the clubhouse is operational and patronage levels are assessed.

As a potential point of reference, the bar and bistro at the Maroochy River Golf Club (including function centre) is licensed from 7am to 12 midnight Monday to Sunday with the golf course operating from 6am to 6pm Monday to Sunday.

The new clubhouse is significantly removed from any dwellings in the surrounding area (with the exception of the new GemLife resort) and as such the potential for adverse amenity impacts is minimised. Notwithstanding this, potential noise impacts were assessed in the Acoustic Report included with this response and concluded to be suitable.

Item 10 – The acoustic report updated to reflect the proposed patronage of the clubhouse, both internally and externally.

Response – The Acoustic Report included with this response assessed the potential for noise impacts associated with the golf clubhouse and it was concluded that compliance with the Noosa Shire Council and SDAP noise assessment criteria will be achieved.

Item 11 – Clarification as to what the ‘gaming lounge’ is to be used floor and the notation on the plan updated accordingly.

Response – this area is intended to provide a space for the playing of board games and the like and there is absolutely no intention that this area will ever be used to accommodate gaming machines. A condition to this effect would be acceptable to the applicant.

Item 12 – Demonstrate how satisfactory walking distances (400m) to public transport services for residents of the development will be achieved. If this involves a proposal for altered public transport routes and new bus stops, then details are to be provided, including agreement from Translink.

Response – Figures 1 and 2 below show that there are 2 public bus stops available within 400m from the site entry along Ferrells Road. In addition to the option of public transport, GemLife also provide a minibus on site which is available to take residents on shopping trips and other outings as required.

Figure 1 – Map extract showing 400m walkable radius from site entry

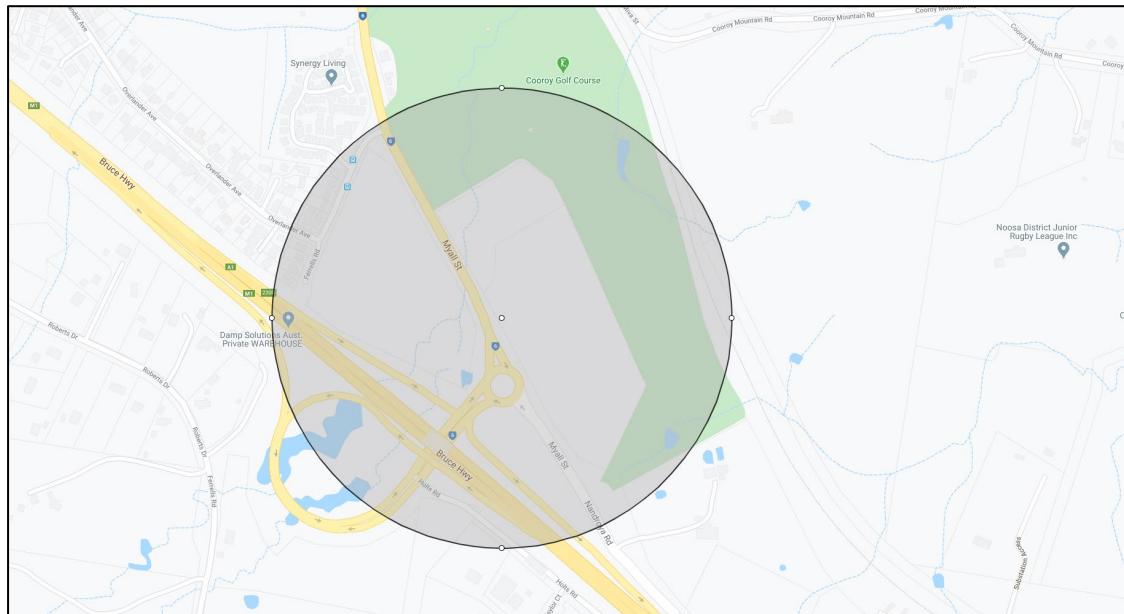
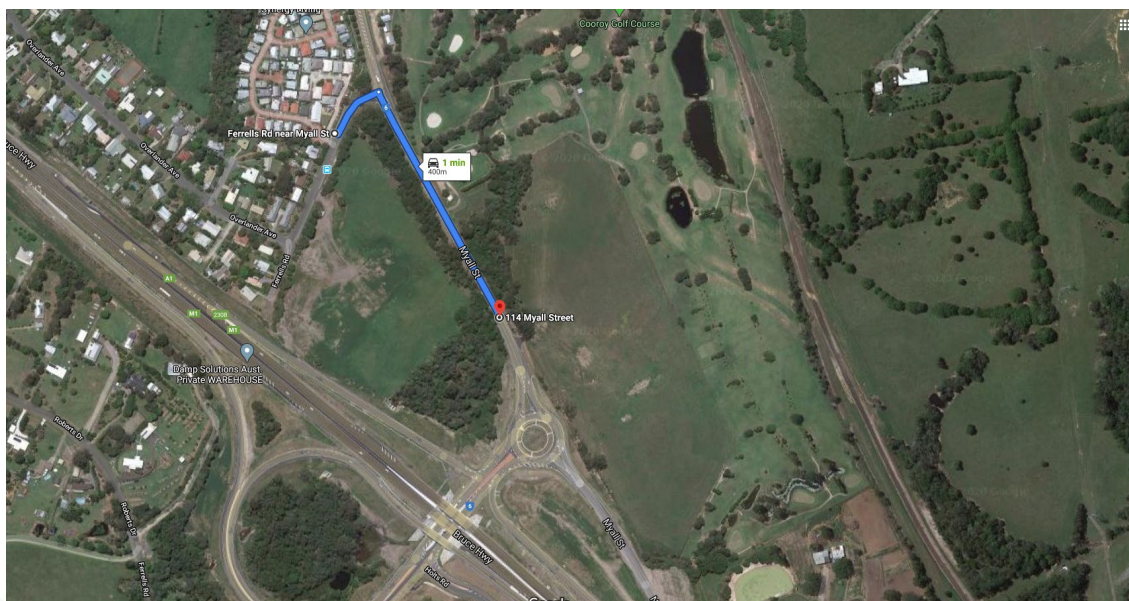


Figure 2 – Google map extract showing 400m walking distance from site entry to bus stop



Item 13 – Prepare detailed plans demonstrating pedestrian paths linking the internal paths of the development with the existing active transport network. The plans will need to include sufficient detail to demonstrate to Council that new paths can be satisfactorily accommodated within the existing road reservation clear of existing table drains and other existing features and will need to demonstrate safe and satisfactory crossing points of existing roads. For completeness in that regard, the plans should also to include the upgrading works at the proposed site access as recommended in the TTM report.

Response – It is recognised that there is some informal drainage infrastructure and topographical constraints in the Myall Street road reserve, however a preliminary engineering review has determined that there will be sufficient width to accommodate a pedestrian pathway that links to the existing active transport network by crossing the road and connecting to the existing pathway in the vicinity of Ferrells Road. A condition of approval is considered appropriate that requires detailed design drawings to be submitted as part of an Operational Works application showing the proposed alignment of the pedestrian pathway and crossing location.

Item 14 – Supply details of the traffic surveys on which the estimates of traffic generation outlined in the TTM report were based, so that Council can determine that they represent comparable examples, and to then update the traffic report accordingly.

Response – The TTM response included at **Attachment 8** provides a response to this item. In particular it is noted that the traffic generation estimates were based on traffic counts undertaken for the Maroochy River Golf Course (it is noted that the Maroochy River Golf Clubhouse and Function Facility is significantly larger than the clubhouse proposed for this facility) and traffic counts were undertaken when competitions were being undertaken to represent peak demand.

Item 15 – The details should include as a minimum the location of the surveyed golf courses as well as the number of golf holes at each course and associated the clubhouse floor areas as well as dates and times of the surveys.

Response – The TTM response included at **Attachment 8** provide a response to this item. The traffic counts were those taken for the Maroochy River Golf Course which includes an 18 hole golf course and 1200sqm GFA golf clubhouse and function facility. Times and dates of the surveys are noted in the report.

Item 16 – For the relocatable home park surveys, the location and number of homes in the surveyed relocatable home parks should be identified and whether the homes are a similar design to those proposed (which are essentially houses) and whether there are restrictions on the age of residents.

Response – The TTM response included at **Attachment 8** used traffic surveys from Opal Living Gems in Logan Village which is a relocatable home park operated by the same provider. Opal Living Gems has a 50+ age of entry limit.

Item 17 – Prepare an amended proposal that satisfactorily addresses these issues, including provision of sufficient supporting assessment documentation.

Response – The TTM response included at **Attachment 8** provide a response to this item which concludes the car parking provided for the proposed development is sufficient to accommodate the demand anticipated by the development (refer to pages 6-7 of the traffic response).

Item 18 – Provide plans of the cross sections of the primary access road, the secondary site access and the internal roads. The road widths must be sufficient to cater for the expected vehicles (resident, parking, service and waste collection) and permit these vehicles to pass.

Response – The original TTM Traffic Report submitted with the application addressed this item (refer page 13) which notes the following:

“The proposed circulation road width of 6m is sufficient to allow a B99 vehicle representative of 99 percent of vehicles) to pass a parked car. For comparison, Planning Scheme Policy 5 of the ‘The Noosa Plan’ states that an access road with a carriageway width of 6m is of sufficient width to accommodate kerb-side parking. As such, it is proposed that visitor parking demand generated above the capacity of the formal spaces provided can be accommodated by kerb-side parking along each of the internal circulation roads.”

In addition to the above, swept path analysis drawings are included with the TTM response included at **Attachment 8** which shows how two cars can pass each other on the internal roads.

Item 19 – Provide details of signage to prohibit truck movements in the northbound direction along the roadway past lots 74-76, and to also increase the kerb return radii at the proposed roundabout to improve its operation and to also enable painted splitter islands to be introduced as a minimum.

Response – The TTM response included at **Attachment 8** responds to this item. The response is also reproduced below for convenience.

“TTM have investigated altering the proposed development to accommodate the truck movements in the northbound direction past lots 74-76. To accommodate the large turning circle required for the nominated design vehicle clear of the secured entry gate, the island separating the northbound roadway and the entry roadway into the site would need to be significantly truncated. The provision of this truncation would provide an unacceptable alignment, opening up and negatively impacting the operation and safety of the proposed intersection. Further to this, a security gate is provided at the entrance to the site. TTM have been informed that the span created by the incorporation of this truncation could not be secured by the proposed security arrangements. It is worth noting that TTM’s original traffic report proposed to restrict service vehicle movements to one-way along this circulation road, with refuse collection achieved via a bin pad positioned adjacent to the Bocce Court. As the revised development scheme has increased the number of units along the northern side of this circulation road to 8, the bin pad would need to facilitate 16 bins (2

bins per dwelling). Taking into consideration the area that would be required to accommodate these demands, it was considered a superior outcome to restrict northbound service vehicle movements to right-turns only. All southbound service vehicle movements are unrestricted. To enforce these arrangements, it is proposed that signage dictating the vehicle length and movements restrictions be installed at the intersection, as illustrated in Figure 6. The proposed signage will be a combination of Manual of Uniform Traffic Control Devices (MUTCD) sign R6-33 and a customised R2-14A sign.

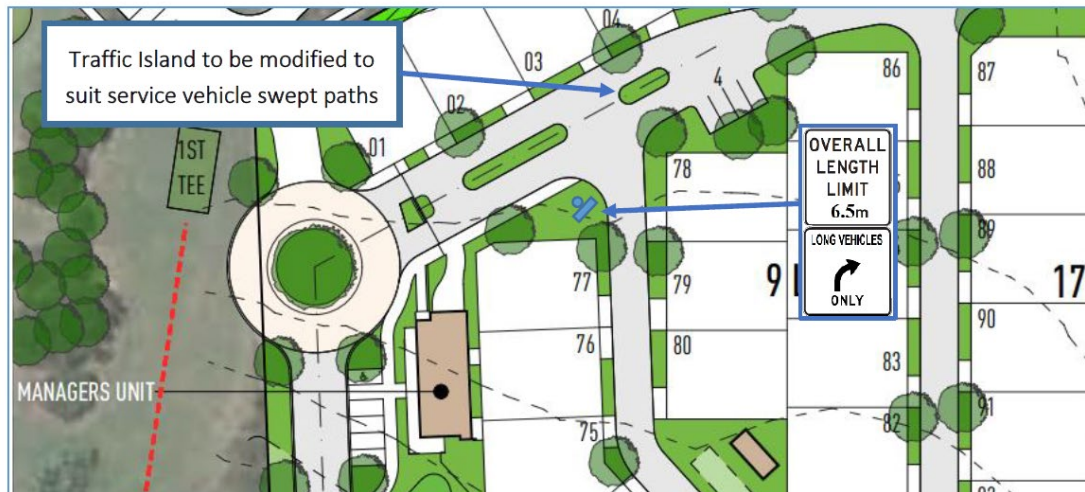


Figure 6: Proposed Signage and Location

“On this basis of the above, the restriction of left-turn movements for northbound service vehicles is considered to be acceptable and will not significantly impact the general accessibility of the adjacent dwellings.”

Item 20 – Amended traffic report to consider the potential impact on the use of the local road.

Response – The TTM traffic response included at **Attachment 8** responds to this item, the relevant extract from the response material is reproduced below for convenience.

“With respect to the above, it is relevant to note that both Myall Street and Elm Street are state controlled roads. As such, the Myall Street/Elm Street priority-controlled intersection falls under the jurisdiction of the Department of State Development, Manufacturing, Infrastructure and Planning (DSDMIP). The State Assessment and Referral Agency (SARA) issued a SARA advice notice with respect to the proposed development on the 23rd October 2019 and did not request that the above-mentioned intersection be analysed.

Whilst the intersection has not been surveyed or analysed, it is evident that development generated traffic will utilise this intersection. However, it is important to note that the development is located approximately 1km from the Elm Street/Myall Street intersection. Taking into gap acceptance and the traffic generation of the development, it is considered that traffic generated by the development will be considerably ‘bunched’ upon arrival to the intersection.

As mentioned previously, the development scheme has been revised to increase the yield to 245 dwellings. Based on the surveyed peak hour generation rates, the revised residential aspect of the development will generate 46vph in the AM peak hour and 31vph in the PM peak hour period respectively.

Per the survey results outlined in the response to Issue 15, the AM and PM peak hour generation rates of the golf course club house are 130vph and 94vph respectively. Since the proposed golf course club house is in fact a relocation of an existing facility, majority of the traffic associated with this component of the development is existing. To ensure a conservative assessment, TTM have assumed that 50% of the generated traffic is 'new'; meaning that these trips are an increase to the existing golf course clubhouse traffic. As such, the total 'new' trips generated by this component of the development is assumed to be 65vph in the AM peak and 47vph in the PM Peak.

The combined generation of the proposed uses is equivalent to an AM peak hour generation of 111vph and a PM peak hour generation of 78vph. With respect to distribution TTM have assumed that 70% of traffic approach the site from the direction of the township, with the remaining 30% approaching from the south; with the outbound movements similarly distributed. This distribution is based on the assumption that majority of the trips generated by the development would likely be associated with the local township. The township was considered to be the major attractor in this instance on the basis of employment opportunities, schoolbased trips, location of shops and considering that local Cooroy residents will likely form the majority of golf course visitors. The above distribution is equivalent to approximately 78vph travelling to/from the township in the AM peak hour period. Assuming that all of these vehicles utilise the Myall Street/ Elm Street intersection, the resultant distribution would be equivalent to approximately 1 vehicle every minute. In the PM peak hour period, the site would generate 55vph from the direction of the township. Similarly, equivalent to approximately 1 vehicle utilising the Myall Street/ Elm Street intersection every minute. On the basis of the above, the traffic generated by the development is not considered to result in a significant worsening of the current operation of the intersection."

Item 21 – Provide an amended development layout which locates development outside of the Riparian Buffer of the Noosa Plan.

Response – Saunders Havill Group have prepared a comprehensive detailed response to address the above information requested in Item 21 which is included at **Attachment 9**. and **Attachment 11**. To summarise these documents, the ecological report assessed the values occurring in the mapped riparian buffer and noted that the proposed development is almost entirely located outside any riparian vegetation and within the cleared paddock area. The report also concludes that the proposed development will meet the purpose of the Biodiversity Overlay Code by protecting existing riparian vegetation and rehabilitating the riparian corridor. The report further concludes that the proposed development will improve the health of the riparian ecosystem through the removal of weeds currently dominating the canopy and provide greater biodiversity and resilience.

Item 22 – Provide an amended layout which clearly demonstrates landscape screening can be provided to the setback areas of the lots which front Myall Street.

Response – The proposed development layout has been revised to accommodate a 10m wide landscape buffer along the Myall Street road frontage of the development site. The Landscape Concept Plan Series included at **Attachment 6** shows how the 10m landscape buffer will complement the existing vegetation in the road reserve to provide a dense vegetation screen to the development. The landscape buffer will accommodate mounting where possible and landscape species will include native trees and ground covers. The Architectural Plan Series included at **Attachment 1** include perspectives from various public viewpoints around the site. These perspectives demonstrate how the proposed development will be barely discernible from the road, only presenting ‘glimpses’ through the heavily vegetated landscape buffer. It is noted that the proposed landscape buffer is significantly wider than the landscape buffer along the front of the Palm Lake Resort at the other end of town.

Item 23 – Demonstrate the proposed non-articulated acoustic fence and roof forms can be permanently screened with landscaping from the major road network.

Response – As outlined in response to Item 22 above, the perspective imagery included with the Architectural Plan Series at **Attachment 1** and the Landscape Concept Plan at **Attachment 6** demonstrate how the development (including rooflines and fencing) will be wholly screened (aside from some partial glimpses) from the major road network.

Item 24 – Provide a visual amenity analysis which provides photomontages of the development from key aspects, including the north and south approach of the highway, Ferrells Road intersection, Myall Street roundabout and key elevated sites off Cooroy Mountain Road.

Response – As outlined in response to Item 22 above, the perspective imagery included with the Architectural Plan Series at **Attachment 1** and the Landscape Concept Plan at **Attachment 6** include photomontages of the development from various public viewpoints. These perspectives are complemented by the Visual Amenity Analysis included at **Attachment 5** which assesses the proposed development from various view points. The analysis concludes that once the vegetated buffer is established the proposed development will have a low impact on scenic amenity values of the area.

Item 25 – Demonstrate the current use on 2SP258566 can continue unhindered by the proposal.

Response – We are aware that the land proximate at 1 Nandroya Road, Cooroy was formerly used as an abattoir, however it is understood that the land has been recently sold and no longer used for this purpose. In any case, if the land was proposed to be used for an abattoir again, a property notation could be placed on the GemLife property alerting potential future residents to the fact that the site adjoins a former abattoir (albeit that it is not currently in operation) such that they are aware of any potential reverse amenity impacts should the land use operations resume. Although we note that given existing operations on the site have ceased that any reinstatement

of the former land use is likely to necessitate an impact assessable development application in any case, at which time amenity impacts (on the GemLife development) would need to be appropriately addressed by the new proposal.

Item 26 – Provide information on the type and amount of the vegetation to be cleared within the golf course to facilitate the development proposal.

Response – Included at **Attachment 10** is an updated Ecological Report that provides a detailed and comprehensive assessment of the vegetation required to be cleared within the golf course to facilitate the development proposal. The report concludes that the development will result in a negligible reduction in vegetation cover and that ecological field surveys did not identify any unique or significant vegetation cover. As such the impact to vegetation as a result of the required works to the golf course will be minor.

Item 27 – Provide information on how the clearing will be ameliorated by reference to the relevant outcome of the Biodiversity Overlay Code.

Response – Saunders Havill Group have prepared a comprehensive detailed response to address this item. Their response letter is included at **Attachment 9** along with an updated Ecological Assessment Report at **Attachment 10**. These documents indicated that the clearing proposed to facilitate the development is minimal as the development has been largely sited on cleared grassy paddock areas and that rehabilitation and revegetation works stand to improve the overall availability and quality of habitat available to native fauna thus representing an improvement upon the existing site vegetation values.

Item 28 – Provide information on facilities specifically designed to cater for young children.

Response – We do not understand the rationale for requiring facilities on site to cater for children given that the development is intended to be an over 50's lifestyle resort, however we note that the site will contain extensive recreational facilities including pools, bowling alley and lounge, tennis court, lawn bowls, cinema, library and craft room that could be used by children visiting any of the residents.

Item 29 – Provide details on how shade trees, landscaped gardens, community gardens and open spaces can be provided within the proposed residential layout, not associated with the golf course.

Response – The Landscape Concept Plan Series included at **Attachment 6** to this response includes a Landscape Treatments palette showing the types of landscaping that can be achieved in front gardens and adjacent to roadways. The plan series also shows the indicative landscape treatments and elements throughout the remainder of the development. There are significant recreational areas and open spaces available throughout the site for residents to enjoy passive or active recreation.

Item 30 – Demonstrate sufficient private open space is available to the residents of the individual dwellings for gardening, clothes drying and enjoyment of the private open space.

Response – Indicative house plans are included with the Architectural Plan Series at **Attachment 1**. Private open space areas consist of a covered alfresco area for each dwelling along with outdoor yard / garden area. Each dwelling typically has a minimum 20sqm of private open space which is complemented by the extensive on site recreational facilities as well as the golf course. As a point of comparison we note that the Palm Lake Resort Cooroy provides dwelling designs with as little as 11sqm of private open space and as such the private open space provided by the dwellings in this development is considered to be more than sufficient to meet the needs of future residents.

Item 31 – Provide further information and/or a revised design and model as necessary to address the following items:

- *The ecological assessment does not extend to the bioretention footprints, which are extensive once batters are accounted for. As the basins are close to riparian areas, the ecological assessment report and associated investigations are requested to be expanded to confirm the locations proposed are appropriate*
- *The engineering plans indicate there is minimal fall from the surface of the bioretention basins to the creek invert. This may not be sufficient for the basins to drain effectively. Provide survey of the outlet locations (including water level) and demonstrate that the outlet pipes achieve the level limits specified in Table 7 of the Bioretention Technical Design Guidelines (Water by Design, 2012)*
- *The waterway stability management design objective stated in Table B, Appendix 2 of the SPP2017 needs to be addressed and achieved.*

Response – Saunders Havill Group have prepared a comprehensive detailed response to address the above relevant matters requested in Item 31 which is included at **Attachment 9**. The updated Ecological Assessment Report included at **Attachment 10** includes the location of four bioretention basins proposed to service the development.

Westera Partners have prepared a response to address the above balance information requested in Item 31 which is included at **Attachment 13**. In summary, additional survey of the bioretention outlet are was undertaken to confirm drainage of these bio basins are capable of being achieved. As requested, the updated Stormwater Management Report at **Attachment 15** has been amended to include the waterway stability management design objective stated in *Table B, Appendix 2 of the SPP2017*.

Item 32 – The flood detention assessment presented in the SWMP is of a type most often provided when a development has the potential to worsen flooding or drainage conditions on a property immediately downstream of the discharge point. As this is not the case here (with the golf course forming part of the application), it may be more appropriate to assess the impact of changes in hydrology on external properties and infrastructure as part of the flood model. This may find that flood detention is not required or needs to be modified from what is currently proposed. The above notwithstanding, if the detention model in the SWMP continues to be used (such as to address the waterway stability objective), then the following is requested to be addressed:

- *Justify the use of the extended rational method or use a method more suitable for detention basin design, which provides more accurate hydrograph shape and volume estimates*
- *The analysis should be undertaken for a range of durations for each event and should consider the effect of the development on longer duration events which may impact properties/infrastructure located further downstream*
- *The analysis should consider a range of temporal patterns in the analysis for each event and each duration, as recommended by Australian Rainfall and Runoff 2016 (ie. ensemble storms)*
- *Provide further information for Table 4 of the SWMP which identifies:*
 - O The IL of the orifice outlets from each basin*
 - O Why the basin storage-elevation data includes a value below the surface level of each basin?*

Response – Included at **Attachment 12** to this response is a letter from Westera providing a response to this item and **Attachment 15** is a revised Stormwater Management Report. To summarise the information provided by Westera:

- The hydraulics and hydrology of the existing and developed stormwater catchments have been reanalysed using XPStorm (Laurenson method).
- The analysis was undertaken for storm durations from 10min – 3hr. The 3hr event being the critical storm event for the overall catchment.
- Temporal patterns in accordance with ARR2016 were utilized in the analysis and the median critical storm event adopted.
- Further information on the IL of the orifice plates and storage characteristics. The levels below the surface level of the bio basin is to model the field inlet pit within the basin which the outlet pipe is connected too.

Item 33 – Provide a revised flood study and associated modelling as necessary to address the following:

- *It is unclear whether the hydrologic model has been changed between existing and developed scenarios to account for development of the subject site. It is considered that all potential impacts from the development should be incorporated into the flood models*
- *Hydrology – the modification of the initial loss to zero for pervious areas would be conservative for estimation of peak flood levels, however, is not conservative for undertaking an impact assessment as this will reduce the hydrologic change associated with development of the subject site. The initial loss should be adjusted for the pre-development case in line with ARR recommendations (i.e. should not be zero unless pre-burst depths exceed the initial loss)*
- *Has the waterway corridor within the site been modified between existing and developed scenarios to reflect the proposed revegetation shown in the landscape plans? Justify the roughness values adopted in the existing and developed cases*
- *Provide updated afflux plots (with blockage) for all events showing the full model extent. Identify areas of afflux <0.01m separately*

Response – Westera Partners have prepared a comprehensive detailed response to address the above information requested in Item 33 which is included at **Attachment 10**. As requested, a revised Flood Study Report is provided at **Attachment 11**.

In summary to the matters above:

- The change between existing and developed catchments has been revised and reflected in the updated Flood Study Report;
- Initial loss has been increased to 15mm;
- The waterway corridor has not altered from the existing case;
- The updated Flood Study Report includes updated afflux plots for all events showing the full model extent.

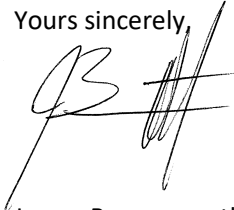
Summation

The above constitutes a full response to Council's information request. We note that the State have already issued a Concurrence Agency Response for the proposal, however due to minor changes to the application as a result of this information request we will be requesting a revised Concurrence Agency Response that endorses the latest proposal plans.

We trust that Council recognises the significant community benefits that stand to be realised by this application and can support the application on this basis.

We will be proceeding to publicly notify the application shortly, however please do not hesitate to contact either of us if anything is required in the meantime.

Yours sincerely,



James Brownsworth

DIRECTOR

INNOVATIVE PLANNING SOLUTIONS



Pamela Davidson

SENIOR TOWN PLANNER