

City Plan now and proposed as it adversely affects Currumbin (Draft for discussion)

Current City Plan [<https://www.gchaveyoursay.com.au/ourcityourplan>]

The [current City Plan](#) as it relates to development approvals in Currumbin is undergoing a review by council who have invited submissions: [Our City Our Plan](#)

The current City Plan is a complex interplay of benchmarks in well-established codes and overlays such as:

1. Ridges and Significant Hills Protection Overlay Code
2. Landslide Hazard Overlay Code
3. Neighbourhood Centre Zone Code [City Plan/Part 6 Zones/6.2 Zone Codes/6.2.5]
4. Transport Centre Zone Code
5. Driveways and vehicular crossings code
6. Strategic Framework
7. Environmental significance Overlay Code
8. Vegetation Management Code
9. General Development Code

And relatively new overlays such as:

10. Building Height Overlay Map See interactive map and type in an address then click Building Height to see the overlay come up: <http://cityplanmaps.goldcoast.qld.gov.au/CityPlan/#>

To see what overlays and codes apply to a particular property just go to [City Plan](#) and type in the address and you'll get an interactive map and side bar that you can click to see more details about the current and proposed amended City Plan for that address.

When the anomalous high-rise developments of The Rocks Resort and Nioka were built, there was a different City Plan. For all their faults in excessive height, these two buildings do not encroach on Currumbin Hills and escarpments which are largely intact behind them They do nevertheless mar the tree scape and obscure the visual amenity of the vegetated green cliffs. That is why, after they went up, the community demanded amendments to the City Plan for DA's moving forward to low rise as they were rightly concerned about the loss of amenity and the negative impact these tall buildings have on the character of the area and its wildlife. Indeed, Currumbin was given its own Local Area Plan which recognized the need to protect its uniqueness. Also, the current 3 storey rule came into operation. Sadly, the Council, in an effort to standardize DA for the whole of the Gold Coast abolished local area plans including the Currumbin Local Area Plan.

The current Building Height overlay for the key areas along the beach and creek foreshore are listed as 3(15) which indicates maximum number of storeys is 3 (but with allowances for 1M basement and 3.5 M roof can be maximum 15 M).

Most developments along the strip conformed to that limit apart from some relaxations of half a storey extra to 3.5 storeys.

The Neighbourhood Zone Overlay states the height rule as 3 storey in 15 metres. The obvious import of that is buildings have to be 3 storeys maximum but can have roof lines that are higher than 9.5

metres. Developers engage creative town planners to cram 6 level buildings into that zone on the excuse that they have 5 storeys not exceeding 15 metres at the footpath (notwithstanding that the City Plan counts 1 M as beneath ground basement and so should be only 14 M from ground level anyway) and that the upper storeys are either not additional “storeys” because they are partially covered pool and entertainment areas or otherwise use the cliffs and slopes of Currumbin Hill behind to justify going to 6+ levels.

There exists a [Building Height Conversion Formula](#) in Council [to be found in Item 5 Building Height changes for limited areas Attachment D] that developers are using as leverage to try and get 5+ storeys into 3 storey areas. The table states for Residential calculations “**3 storeys and a maximum height of 15 metres**” and for commercial calculations (where there is a Neighbourhood Zone) “**3 storeys and a maximum height of 16 metres**”. The annotation on the table indicates that it is anticipated that above ground 3 storeys of buildings in a:

- residential zone would equate to 10.5 M above ground maximum plus allowance for a roof of up to 3.5M and
- commercial/neighbourhood zone 11.5M above ground plus an allowance of up to 3.5M for a roof, the extra 1 metre allowing for higher ceiling heights on lower levels for shops/offices.
- In each case there is an allowance of 1 M underground for a ‘basement’
- In no case is there justification to give that 1 M basement allowance above ground.
- In no case is there justification for using 3.5M roof allowance to put in extra storeys.

And yet we know from a recent DA that was approved by Council along Pacific Parade the developer proposed 5 storeys using 15 M allowance as an excuse to add another 2 storeys of apartments plus a 6th level pool and gazebo covered entertainment complex on top, which is in truth and in law another 6th Storey. That DA was knocked back by the politicians in Council but is now on Appeal. This is an anomaly as the roof allowance of 3.5 M was not used for roof as the roof was flat form and the basement 1 M was used as part of an above ground total calculation.

This anomaly is further compounded by the Building Height Overlay code.

All this is bad enough in itself but then when one considers that the these overbearing apartment complexes are being applied for in a zone that is meant to be primarily neighbourhood zone for shops and services building was in front of a significant Currumbin Hill vegetated Cliff that would be destroyed and excavated to build this 6 -level building against the outcomes mandated by the Ridges and Significant Hills overlay, the rationale for amending the plan becomes compelling.

Save Currumbin’s proposed amendments to existing City Plan

Save Currumbin want the current plan amended to put beyond doubt that the height limit is 3 storeys not 5 storeys and not 6 levels.

We want the 15/16 metre wording removed as it provides a loophole for developers to thwart the clear intent of the legislation and the will of the people and replacing it with 3 storey maximum. We would prefer it to correlate to 9.5 M. However, to allow some storeys to be higher we appreciate that it may be necessary to allow correlations to 10.5 metres for residential and 11.5 metres for commercial zones subject to approved design modifications to allow non-habitable/useable for any activity roof structures only. These roof modifications will not apply along Pacific Parade as the extra 3.5 metre roof allowance contemplates a pitched roof and that would obscure the amenity of the green Currumbin Hill behind.



The built form and height along the vegetated cliff lots on Duringan Street and Pacific Parade foreshore in Currumbin should be flat roofed 3 storey. A good example of what Save Currumbin want is to be found opposite opposite Throwers Bridge. [This strip](#) of relatively new mixed-development restaurants/shops and low-rise apartments on the corner of Duringan Street and Gold Coast Highway pictured below:



As one of my fellow residents quipped “1,2,3, end of storey!”

The height limits must be measured from natural ground height at the footpath and no part of Currumbin Hill ridges or escarpments (whether on or adjacent to the lot) may be used as natural ground height (as otherwise theoretically a developer could build in or on top of the vegetated cliffs which ought to be preserved).



To save the significant Currumbin Hill its vegetation and visual amenity for the public and the animals that depend on it, Save Currumbin want a prohibition on any building on or within 2 metre setback of the Currumbin Hill cliff and escarpment between Pacific Parade and Woodgee Street.



Also as there is a correlation between building height policy and density and amenity and car parking (see Item 6 reports from Our City Our Plan), and as there is an alarming shortage of public car parking along Pacific Parade during the day especially in peak season and special events like Nippers, Surf Carnivals and Swell, there is yet another reason to limit DA heights to 3 storeys [ground floor decent sized shops on first level and 2 levels of apartments on top along Neighbourhood precinct and 3 storeys of residential elsewhere].

Proposed amendments by GCCC:

Maximum Building Heights along Durrangan Street and Pacific Parade

The best way to see what is in the Plan and what is proposed is to go to [Our City Our Plan](#) and click the Items and hold and move interactive maps till you get to Currumbin. For example, Theme 1 Height & Density will have to the right various tabs starting with overview. Next tab along is Item 1&2 Building Height Overlay Map and new building height categories. When you click and drag map till you get to Currumbin and click repeatedly to zoom right in and let go you'll see Current on left and Proposed Building height map on right. You will see 15M for the strip in front of and on top of Currumbin Hill vegetated cliff in the main part/most iconic part of that strip but reduced curiously either side of it to 12M.

As can be seen from the overlay maps of the proposed changes for Currumbin, the Council propose dropping the height from 15 metres upper limit to 11M along the headland where Durrangan Street joins Pacific Parade, then 12M to Murraba Street then keeping the anomalous and objectionable 15 M height along the shopping strip to Elephant Rock café steps of council to Woodgee Street then dropping back down to 12 M along the rest of Pacific Parade.

[Our City Our Plan supporting documents](#)

<https://www.goldcoast.qld.gov.au/our-city-our-plan-supporting-documents-51202.html>

Late Night trading for bars and restaurants

[Item 20 Neighbourhood Centre "Improvements"](#)

"Neighbourhood centres are intended to be a cluster of land uses that seek to support the needs of the surrounding community. Currently, City Plan identifies that the establishment of new neighbourhood centres in a suburban neighbourhood (typically found in the low-density residential zone) are determined by the needs of their immediate neighbourhood catchment, calculated as the planned population and/or jobs within a 1000-metre walk from the proposed centre. However, this planning principle was considered to make new neighbourhood centre difficult to achieve due to their low-density environment. Therefore, an alternate measure has been proposed.

The City also undertook a review of the types of activities and trading hours occurring in our existing neighbourhood centres. To support the ongoing **vitality** of our neighbourhood centres located in the "*coastal tourism or urban strip*" identified on Strategic framework map 5 and at Paradise Point, we are proposing to **extend trading hours from 10pm to midnight**, where centres are located on busy road and noise management treatments can be put in place to mitigate any potential impacts on residential amenity."

[Council report - Draft outcomes for the neighbourhood centre investigation project](#) (PDF 124kb)

[Attachment A - Neighbourhood centres high frequency road](#) (PDF 13mb)

[Attachment B - Drafting changes](#) (PDF 13.5mb)

Save Currumbin's requested amendments to proposed amended City Plan

The proposal to stagger heights in and around the coastal roadways to 11 M, 12M and 15M is not acceptable.

It makes no sense to have a higher maximum height in front of the Woodgee Street escarpment part of Currumbin Hill than the rest of Pacific Parade. It should be much lower in front of that green iconic strip. It should be uniform 3 storeys all the way (which is roughly 9.5 Metres and perhaps an allowance of another metre or two if the design of a ground floor shop can be demonstrated to require it).

Save Currumbin want 3 storey 9.5 M limit imposed on all buildings along Duringan Street and Pacific Parade. This is especially necessary as behind each of the potential lots for DA's are Currumbin's Hills and significant vegetated cliffs and ridges. There should be a uniform strip of green as one looks to the land from the beach and creek and not high rise above 9.5 metres. Certainly, there is no reason to have an anomalous 15 metre height remain along the Neighbourhood Zone Centre precinct and have 12 M either side of Murraba Street and Elephant Rock Café. Because of the overriding importance of the significant vegetated hills behind properties along the foreshore of the beach and creek, the maximum building height should be uniform 9.5 metre/3 storey all the way around Duringan Street and Pacific Parade.

No Late Night trading

Leave trading hours as they are. No trading after 10PM. There is no demand for extended trading hours either from residents or existing venues that service the community extremely well.



The relationship between the current venues such as the Currumbin Surf Life Saving Club and residents is excellent (indeed many residents are members) and should not be disturbed.

Currumbin Neighbourhood Zone precinct is unique. We are not like the other Neighbourhood Zone Centres like Surfers paradise, Mermaid or Coolangatta and should not have the same policy grafted onto it. Extended hours are inappropriate in a quiet, predominantly residential area. Any noise (and there will be a lot more with late night bars) emanating from Pacific Parade carries by amplification in the cone that is formed by the steep slopes of Currumbin Hill right to all the residents dotted on those Hills. It is an unacceptable and gross violation of a residential area's amenity. Pacific Parade is not a major road or highway especially at night where traffic is minimal. Accordingly, Currumbin ought to be deleted from the maps in Item 20 targeted for late night tourist traffic.

Further Amendments to the City Plan requested by residents and visitors

Protection/preservation of vegetated cliffs of iconic Currumbin Hill

In addition to the above, the residents and visitors to Currumbin want the vegetated cliffs of Currumbin Hill between Woodgee Street and Pacific Parade completely off limits to any form of development on or within 2 metre set back. There is already a preservation order in place to protect a large beautiful tree to the South of Lot 774 (Council steps between Woodgee and Pacific Parade). Accordingly, there is already a precedent for preserving natural assets along the Currumbin Hill ridge/cliff line and this preservation order ought extend to all vegetation and cliff faces to the North and South of that tree.



But of what use is protection of that green line when just a few metres to the North of Lot 774 the vegetated cliffs that form the same green line, the same animal corridor is open season to deforestation and massive excavation and development? So, we want a specific preservation order on that part of Currumbin Hill and primacy hard wired into the City Plan for the Ridges and Significant Hills Protection Overlay Code, so it trumps any other code.

To date it simply gets ignored if a building passes the '15 M' height limit from ground height measured from even the slope and cliff face of a Ridge and Significant Hill (itself a gross defect in the plan that needs amending) .

The green cliffs are not only essential to the sense of place but moreover are home to plants, insects, birds, lizards, snakes, wallabies and many other animals all of whom are in peril if developers can destroy the cliffs ridges and hills that sustain them. Currumbin's vegetated cliffs support a rich birdlife including [Kookaburras](#), Coddkatoos (white and black), [Galahs](#), [Currawongs](#), [Crimson Rosellas](#) and [Australian Ibis](#).

Indeed, one of the Gold Coast's biggest attractions is the Currumbin Wildlife Sanctuary. Many of the birds that feature in the Sanctuary's daily shows like the [Rainbow Lorikeet](#) will suffer if 'open season' is declared on Currumbin Hill's vegetation by leaving the City Plan unamended in a sensible and sustainable way. Currumbin Hill cliffs need to be recognized and preserved in the Environmental Mapping [Item 22] and not just lip service let alone mocked by allowing over development to de-vegetate Currumbin hills and cliffs.

Overdevelop Currumbin by destroying its vegetated cliffs and hills and you can say bye bye to Currumbin Wildlife Sanctuary.

It is well recognized that animals and birds need green corridors for sustainability. If Currumbin Hill behind the Neighbourhood Zone strip is effectively concreted over, not only will an important community amenity be destroyed forever but so too will an important green corridor for animals.



Currumbin is where the rainforest meets the sea and its enchanting slopes and ridges should not be destroyed built on or hidden.



Currumbin Beach is the gateway to glorious Currumbin Valley. It is part of the same green corridor. We need as a whole to keep our green credentials as a tourist destination that is renowned for its natural beauty and wildlife.



What is clear from the recent anomalous decisions of Council town planning, is the disregard shown to the importance of the [Landslide Hazard Overlay Code](#) for Currumbin especially along the steep slopes between Woodgee Street and Pacific Parade noted as a moderate to high risk of landslide. A development was allowed halfway along the that saw a huge landslide problem that had to be urgently fixed with a Chernobyl like encasement of concrete to stop the whole hill sliding into the sea next to the Surf Life Saving club. Just recently council officers approved another development of a 6-level apartment complex on a small 400sqm block that would have (had the elected councilors not reversed the approval) seen 1,400 cubic metres of Currumbin Hill excavated seriously undermining the base of the whole cliff.

When residents quizzed council about why they allowed it initially, it was pointed out that it had an engineers certificate to say the risk of landslide at this stage was in his opinion 'low', notwithstanding that there were only 2 bore holes dug vertically into the sand (no holes being sampled into the hill itself) and even though the report was heavily qualified. It basically said that the builder would have to engage engineers to get the best building outcome as the need arose. In other words, 'suck and see' was good enough for council. Apart from God who else can look down upon the green cliffs of Currumbin and care about the cumulative effect of developers all honeycombing out the base of the cliff?

For Council, there was no thought at all of the cumulative effect of neighbors of that lot owner also removing similar amounts of Currumbin Hill when the flood gates opened on high rise along Pacific Parade. The rather glib response by council was that they really didn't care as to what might happen to Currumbin Hill if neighbours of the DA applicant all did the same thing. With their head firmly in the sand the Council's view was that it was not their concern as Council only look at what is immediately before them on a case by case basis. Such myopic and clearly negligent attitudes about what is clearly a a foreseeable risk when everyone along the Neighbourhood Zone Centre strip starts excavating thousands of cubic metres of rock and soil away in a high risk zone for land slippage and landslide is a recipe for disaster well beyond the insurance moneys of a consulting engineer.

Massive excavations one after the other are likely to lead to massive lawsuits against the Council when Woodgee Street and Murraba Street properties come crashing down into Pacific Parade.

It will be too late when there's a Thredbo-like landslide of Currumbin Hill to then say sorry we should have taken more care to assess what the cumulative effect of over development at the base of the cliff would be.

One would think that after the terrible landslides that occurred on Currumbin Hill on the other side of the Highway back in 2005 and 2009, Council would not be so cavalier with their duty of care to avoid foreseeable risk and have in place prudential guidelines about requiring engineers to test for and factor in the likely effects on adjacent geology of all likely forms of development that may happen at the same time or follow suit after their development in all conditions and especially in high rain events.

Save Currumbin demands that in all assessments on DA's reasonable attention has to be given to likely cumulative effect of massive earthworks (and in any case excavating the foundations of Currumbin Hill or on Currumbin Hill ought to be banned in any case).

Currumbin's uniqueness needs to be protected in an amended City Plan



Currumbin is a unique piece of the Gold Coast who's green and family friendly characteristics deserve an amendment of the Current Plan and a revamp of the proposed amendments to the Plan.

Without these amendments Save Currumbin is requesting to the existing City Plan and the proposed amendments to it, a combination of high-rise buildings tearing into Currumbin Hill's vegetated cliffs and late-night bars will turn the family friendly green village of Currumbin into 'Gotham by the Sea'.



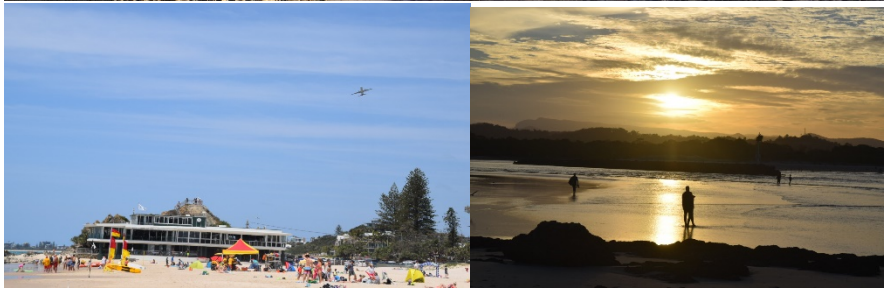
Currumbin does not want to go the way of Palm beach



You can help us stop the fate of Palm Beach coming across the Currumbin Bridge by adopting as your own our template submissions we are developing through an expert team. Register today

www.savecurrumbin.com

Currumbin is unique and worth saving.



The final date for public submissions is 5pm **11 November** 2019.

Ironically the final day for you to Save Currumbin from overdevelopment is Armistice Day (11th day of the 11th month) commemorating as we do our men and women in uniform saved us to have the kind of life we cherish in Currumbin with a minute's silence and celebrate so uniquely at Currumbin Beach every year on ANZAC day.



Formal submissions must meet the following criteria:

- be relevant to the items listed in the update package
- be received by Monday 11 November 2019
- detail the name and address of each person making the submission
- detail the grounds of the submission and the facts and circumstances relied upon to support the grounds.

Save Currumbin are getting experts to help the community formulate submissions and will make these templates available to people who register on www.savecurrumbin.com

To register/subscribe click [HERE](#)

Once you download the template submissions from Save Currumbin you can amend them as you see fit and then either email them off cityplansubmissions@goldcoast.qld.gov.au or lodge them online www.gchaveyoursay.com.au/ourcityplan or mail them to CEO City Gold Coast PO Box 5042 Gold Coast MC Qld 9726.



If you would like to know more check out our [webpage where you can register to get the expert submissions to send to Council](#) and visit, like, and share #SaveCurrumbin social media pages on [Facebook](#), [Instagram](#) and [Twitter](#) and if you have any questions about Save Currumbin you can contact coordinator of Save Currumbin Action Group Peter Janssen Peter.janssen@corporatefirst.com.au