

15th July 2025

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[Redevelopment of 776 Pacific Parade – current amended application OTH/2025/12](#)

Dear Mr Brown,

Subject: Letter of Objection to Development Approval OTH/2025/12 -776 Pacific Parade Currumbin (776)

I write for and on behalf of the Gecko Environmental Council Assoc. Inc (Gecko) to express our serious concerns regarding the impact of the above proposed development on the natural environment of Currumbin Hill as well as its apparent non-compliance with the City of Gold Coast Planning Scheme. The opinions expressed here are not those of planning experts, but those of concerned community residents.

Gecko Environment Council Assoc. Inc. is a not-for-profit environment association founded in 1989 and has been active for the past 34 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko's Mission is "*To actively promote, conserve and restore the natural environment and improve the sustainability of the built environment of the Gold Coast region in partnership with our member groups and the wider community.*"

It is in this light that we write to you requesting that Council not approve the development at 776 Pacific Parade Currumbin in its current form.

We believe the proposal is an overdevelopment which does not comply with planning law in that it exceeds 3 - storeys in any one plane and it fails protect the vegetated ridgeline of the

Currumbin escarpment which gives Currumbin its unique sense of place as well as habitat for the flora and fauna.

We include an extract from a Report from Victoria Baker obtained some years ago in relation to an application for 780 Pacific Pde, Curumbin, by Save Currumbin community group which discusses the Currumbin Hill escarpment eco footprint and the important flora and fauna present at that time which ought not be disturbed. Ms Baker's report is equally relevant to the current application at 776 Pacific Pde and could be construed to be even more relevant today given the scale of the 776 development.

The report states relevantly:

*“ The Currumbin community and visitors value the local flora and fauna. The green and lush corridors along the escarpment provide Currumbin's visual aesthetic and appeal. The limited habitat availability and reduced connectivity is already impacting the local wildlife populations. The key threatening processes place considerable pressure on ecological and amenity values. Enabling development of the Currumbin cliffs and escarpment would set a precedence for further development of the foreshore and impact the local fauna populations by further reducing limited habitat... The City of Gold Coast Council planning department needs to retain fragile green spaces and wildlife refugia in conjunction with future development projects along foreshore areas to prevent localized extinction. Rare species such as the Beach Stone Curlew are at risk of extinction in addition to other species across the broader region. Accommodation for these species is essential in order to provide balance between residential areas and shared habitat space.... **It is recommended to reject this proposal and mitigate the impacts to the corridor** by requesting a more sustainable design that incorporates habitat enhancement as opposed to further habitat destruction. The criteria of the Shoreline Management Plan require extensive ecological assessment for any development including 780 Pacific Parade and future foreshore upgrades. A Conservation Strategy specific to Currumbin is required to fully identify the values, threats and remediation strategies for protecting the coastline into the future. Further developments should focus to retain and enhance green space along the foreshore corridor to **ensure visual integrity is maintained along with vegetation coverage for slope stability and provision of habitat.**”*

The purpose of the **height restrictions** in the Height Overlay Map in the City Plan for this zone of **3 storeys/15M** in Currumbin must be seen in the context of the **Ridges and Significant Hills Overlay Protection Code** that seeks to protect the vegetated Currumbin Hill escarpment. The escarpment gives Currumbin its unique character and sense of place and affords a valuable corridor for animals and flora for bird habitat. Any development in this area must undertake to have minimum impact and the current application does not, in our opinion, fulfill this requirement.

In terms of public amenity the building height proposed for 776 should not impede existing key strategic views from coastal headlands back to the hinterland and ridgelines. The top of 776 should be below the vegetated ridgeline.

It seems unlikely that trees and vegetation planted behind 776 built can grow taller than 18 meters above the rear 7-level building or provide the natural habitat for local flora and fauna. Whatever is proposed to be planted in this constrained space must clear the proposed building and adjoining properties by 3 metres. Further limbs must not overhang or

compromise the safety of the public path at 774 Pacific Pd

STATEMENT OF LANDSCAPE INTENT (SLI)

The applicant is required to submit a Statement of Landscape Intent (SLI) reflecting the latest building configuration and associated landscaping works to assist addressing Performance outcome (PO4) of the General development provisions code. The SLI is requested to reflect the requirements of SC6.13 City Plan policy – Landscape work and include the following additional details:

- a) Soil depth/volume information is requested to be included within the SLI relating to all planters associated with the development.*
- b) Officers seeks clarification the refenced raised planter at the ground floor level fronting the shop tenancy will be available for deep planting to allow for the nominated vine planting on the northern wall as shown in the perspectives.*
- c) Maintenance and installation details of any trellis or green wall systems nominated on the façade of the building are requested to be included within the updated SLI.*
- d) Cross-sections of the landscape treatment within the rear setback area are requested to be included with the SLI.*

APPLICANT RESPONSE

Refer to the landscape plans in Part 2 attached. It is also noted that per the conditions of the existing approval a subsequent landscape operational works application will be required in due course.

It is also noted that Council's action notice raised a number of information request items. The following table responds to those information request items:

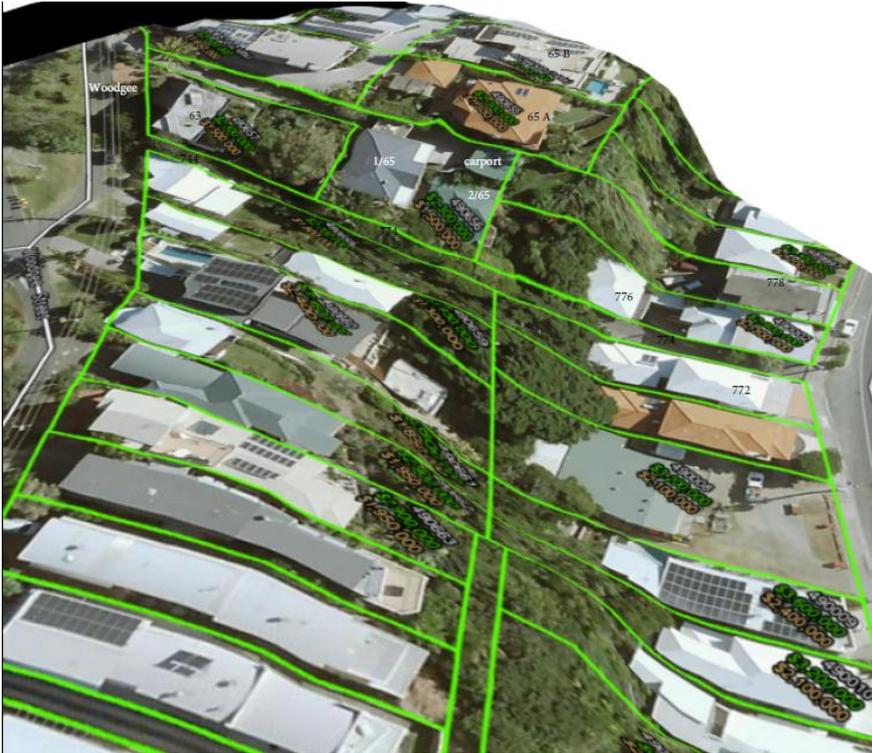
Table 2: Information Request Response Items.

IMPACT ON THE CURRUMBIN HEADLAND

Overall outcome (1) and (2) and PO3 and PO5 of the Ridges and significant hills protection overlay code. The developments changed design is now wider and higher than the approved outcome. Officers consider that this increase in bulk does not minimise the visual impact of the development within the Currumbin headland, resulting in a dominant outcome that is not compatible with the natural characteristics of the area. Further the development includes minimal landscaping treatments to soften this additional built form. As such, the applicant is requested to amend the design to be more sympathetic to the headland and meet Overall outcome (1) and (2) and PO3 and PO5 of the Ridges and significant hills protection overlay code.

Nioka and The Rocks Resort are not precedents [see *The Building Height Study (BHS) prepared for Council in 2017*] and in any case are not built into and in front of and towering over the escarpment as 776 proposes to do. Both Niola and the Rocks were subject to extensive community opposition. See **Figure I**.

Figure I



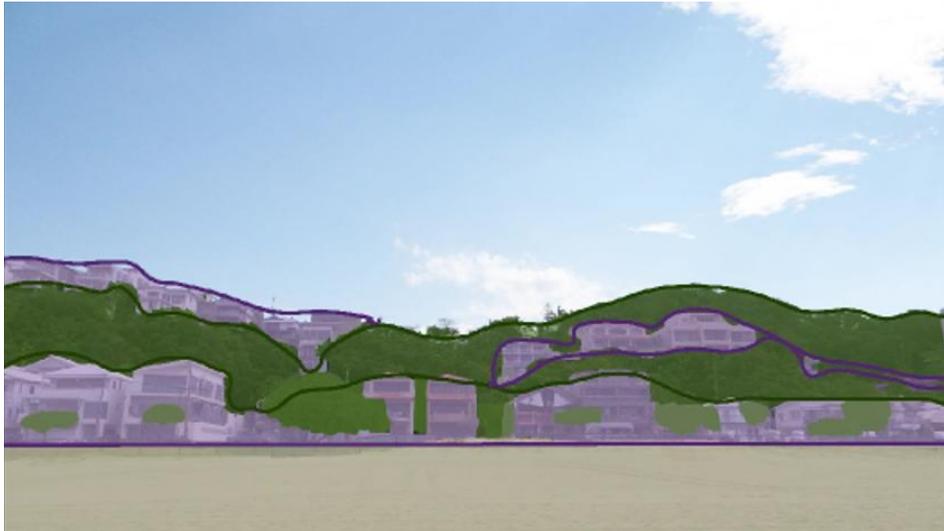
The applicant has lodged amended plans and supporting information with Council on 9 July 2025 in response to Councils 'Action Notice' issued on 20 June 2025.

Council in the past has rightly refused DA's whose "built form, height, density and other impacts associated with the proposed mixed-use development would detract from the sense of place, natural hillside and scenic and amenity values intended for the locality". They did so for Material Change of Use Application MCU201701607 for a multiple dwelling at 780 Pacific Parade, Currumbin (780) which achieved a maximum height of RL22.9m AHD to keep the top of the proposed building **below** the **vegetated escarpment** of Currumbin Hill.

Gecko has concerns that Council might now approve the 776 development that is over 9 metres taller (being RL30.28m AHD+) and twice as wide as 780 and fails to stay below the **vegetated escarpment** of Currumbin Hill but now **rises between 12.5 to 18.7 m above** the vegetated ridgeline of the escarpment. It is so wide and tall that it is unlikely that any amount of deep planting behind the building will make any visible difference to the public amenity from the beach. In that regard we refer Council to the expert opinion of Nick McGowan of 2019 which was sent to Council several times by community groups and his graphic [**Figure 2**] of the vegetated ridgeline demonstrates the vegetation which will be forever lost to the community if 776 goes ahead at its present height and width.

It is Gecko's opinion that this outcome does *detract from the sense of place, natural hillside and scenic and amenity values intended for the locality.*

Figure 2



Gecko understands that Save Currumbin Ltd has made extensive submissions to Council supported by many eminent expert's reports including Town Planners, Geotechnical Engineers and Barristers. We concur with the opinions expressed in those submissions and reports (that state clearly that 776 is a 5-storey building and so 'not properly made' as a code assessable application) and strongly request the council refuse to accept the 776 application in its present form.

It is our considered opinion that this application should be an impact assessment application. This will allow fuller assessment, including against the City Plan Strategic Framework, and will provide an opportunity for residents to make submissions with additional information.

In summary, we strongly urge Council to refuse to accept the 776 application in its present form.

Yours sincerely

Lois Levy
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