

Submission to Development application:

Application number:	COM/2025/157
Application type:	Combined Application
Location:	Lot 2 RP86756

Submission date:	5/09/2025
Response type:	Submission - Objection
Response summary:	--- OBJECT --- My Grounds are set out in the attached letter. Surname: Mossley Given Names: Troy Address Line 1: 52 Stapylton Street Suburb: Coolangatta State Code: QLD Postcode: 4225 Email Address: troy.mossley@hotmail.com

Troy Mossley
52 Stapylton Street
Coolangatta QLD 4225

5 September 2025

Assessment Manager
Planning and Environment Department
Gold Coast City Council
PO Box 5042
Gold Coast MC QLD 9729

Formal Objection to Proposed Development – Application number COM/2025/157, 60 Dutton Street, Coolangatta, Queensland 4225

Dear Assessment Manager,

I am writing to formally object to the proposed development at 60 Dutton Street, Coolangatta, Queensland 4225 (Lot 2 on RP86756) (**Property**) which seeks approval for the construction of a new ten storey residential building with a height of 33.15 metres (amended to 9 storeys and a height of 29.65m) and a site cover exceeding the maximum allowable site cover (**Proposed Development**).

The Property is a 703m² block, zoned as medium density residential, with a maximum building overlay height of 23m.¹

This proposal raises serious concerns regarding its compliance with the Gold Coast City Plan, particularly within the Medium Density Residential Zone Code (**MDR Code**). The purpose of the MDR Code² will be achieved if, in respect of the built form of the development, the relevant building:

- a. has a building height that does not exceed that indicated on the building height overlay map;
- b. is setback from road frontages to promote an urban setting and interface with the street;
- c. is setback from side and rear boundaries to protect the amenity of adjoining residences; and
- d. has varying site cover to reduce building dominance and provide areas for landscaping.

For the reasons set out below, the Proposed Development does not achieve these purposes and does not comply with the MDR Code.

Grounds for Objection

1. Non-compliance with Building Height Requirements

As noted above, the MDR Code states that building height must not exceed the limits shown on the Building Height Overlay Map which, for the Property, is 23m.³ The Proposed Development is intended to be 33m (amended to 29.65m), which still significantly exceeds the building height designated for the Property.

¹ [Building height overlay map - index](#) (accessed 28 August 2025)

² [Planning Scheme - City Plan](#) (version 12 effective 27 June 2025) (accessed 28 August 2025)

³ [Building height overlay map - index](#) (accessed 28 August 2025)

Further, while there may be an uplift allowance that the Applicant would look to rely on to increase the height of the building, the uplift is subject to impact assessment and must demonstrate compliance with the Gold Coast City Council's Strategic Framework (and in particular, Outcome (9) in paragraph 3.3.2.1). Relevantly:

- The Proposed Development offers no additional public open space (and given the site coverage of the Proposed Development, there appears to be less open space).
- The Proposed Development offers no proposed infrastructure upgrades.
- The proposed height of the Proposed Development does not retain the current neighbourhood character, and relevantly:
 - the properties either side of the Proposed Development are single story or 2 storey dwellings;
 - the surrounding buildings (both immediately across Dutton Street and in the immediate vicinity) are a maximum of 3 storeys; and
 - the maximum building height for property across Dutton Street is 9m (and therefore, any transition of the urban environment is appropriately dealt with by a maximum height of 23m).
- The Proposed Development:
 - creates undesirable local development patterns;
 - is not consistent with the intended built form character of the local area;
 - does not respect visual corridors;
 - disrupts the established streetscape and sets a precedent for overdevelopment;
 - will have an impact that will be overbearing on neighbouring properties; and
 - is contrary to reasonable community expectations.
- The Proposed Development does not deliver any additional affordable housing – 4 bedroom units in Coolangatta have a similar value to 4 bedroom houses.

Given the above, the Proposed Development does not reinforce local identity and sense of place and does not offer community benefits. Further it disrupts the established streetscape and is not within the identity and character of Dutton Street, and the surrounding streets including Tweed Street and Stapylton Street.

The Applicant has argued that the Proposed Development should be permitted given developments at 25 Dixon Street, 27 Dixon Street and 4 Carmichael Close. It is my view that this argument should hold little weight. Unlike the Proposed Development, those properties are on the Queensland / New South Wales border, are in a location where there are currently buildings at or about the maximum building height for the MDR Zone (both in Queensland and in New South Wales), and those properties are not adjacent to a low-density residential zone. Therefore, the streetscape, identity and character of Dixon Street is very different to that of Dutton Street and should be considered separately.

The application does not appear to provide sufficient justification or public benefit to warrant approval of the uplift. On that basis, the height of the Proposed Development is inconsistent with the MDR requirements and should be refused.

2. Setback requirements and site cover

The MDR Code set out specific minimum setbacks and site coverage required for buildings of various heights.

It appears that the Proposed Development significantly exceeds the site cover limits and setback requirements for buildings of that scale. Specifically, it appears that the proposal indicates site cover of approximately: (i) Ground Floor: 70%; (ii) Level 2: 60%; (iii) Level 3: 55%; and (iv) Levels 4–9: 50%, and, in addition, do not appear to comply with the setback requirements in the MDR.

This level of coverage is inconsistent with the planning scheme's intent to preserve open space, facilitate deep planting, and maintain residential amenity. The excessive bulk and scale will result in reduced landscaping, increased urban heat retention, and diminished visual relief.

Further, the argument of the Applicant appears to be that having to comply with the MDR Code (by having compliant setbacks) would result in a building width which would significantly compromise the quality and functionality of the apartment product. This argument does not seem to be a justifiable reason for not complying with the MDR Code, and given the width of the Property, this would suggest that: (i) the Property is not suited to apartments; and (ii) a different type of product should be constructed on the Property.

Based on the plans, it does not appear as though the Proposed Development meets the requirements set out in the MDR Code.

3. Impact on Neighbourhood Character and Amenity

The MDR Code emphasises that any development must:

- Positively contribute
- Retain important elements of neighbourhood character
- Avoid unreasonable impacts on adjoining residential amenity
- Achieve high-quality urban design.

As noted above, a 29m/33m building in a predominantly low-rise area is completely out of character with the surrounding neighbourhood and does not positively contribute to the urban context. It is a means by which a developer is seeking to extract as much profit as possible out of the development by not complying with the MDR Code. This Proposed Development will adversely affect the overall amenity of neighbouring dwellings, contrary to the objectives of the MDR Code.

This development will overshadow homes, will present an appearance of bulk, reduce privacy, and alter the established character of the neighbourhood.

4. Water and Sewer Connection and Capacity

It is noted that in the Engineering Services Report dated 20 May 2025 (as part of the Specialist Reports submitted by the Applicant), paragraph 7.4 notes that the results of the water and sewer capacity tests indicate that the proposed development does increase the water and sewer demand flows beyond what has been allowed for within the City of Gold Coast City Plan (emphasis added).

In my view, this is a further reason why the uplift must not be approved, and indicates that further restrictions may be required for a building that is constructed to 23m.

5. Deep Planting and Landscaping Deficiencies

The Gold Coast City Council plan mandates that developments in the MDR zone must include:

- 12% of site area as deep planting
- 25% of site area as landscaping (inclusive of deep planting)

These provisions are essential for maintaining urban greenery, biodiversity, and amenity. The Proposed Development appears to underdeliver on these requirements.

Conclusion

It seems that a building of the nature of the Proposed Development is not suited to the Property and would require approval of a product that does not align with the Gold Coast City Plan's strategic intent, particularly regarding building height, site cover, setbacks, landscaping, water and sewer connection and capacity. It risks setting a precedent for overdevelopment and undermines the community's expectations for sustainable and respectful urban growth.

I respectfully request that the Gold Coast City Council refuse this application or require substantial amendments to bring it into compliance with the planning scheme.

Thank you for considering my objection.

Yours sincerely,
Troy Mossley