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To: [City Information Operations](#)
Subject: Fwd: Submission of Objection - 37 Arthur Street, Mermaid Beach - Application No OTH/2025/18
Date: Friday, 12 June 2026 1:04:29 PM
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From: gshort2451@gmail.com
Sent: Thursday, June 11, 2026 11:44 AM
To: mail@goldcoast.qld.gov.au
Subject: Submission of Objection - 37 Arthur Street, Mermaid Beach - Application No OTH/2025/18

Hi there, Please find attached our formal objection to the above development. I trust GCCC officers will see the development for what it is and refuse this inappropriate development.

Kind regards,

Greg & Tina Short

P: 0413 159 354

E: gshort2451@gmail.com

A: 31 Seashell Avenue, Mermaid Beach QLD 4218

SUBMISSION OF OBJECTION

Development Application OTH/2025/18

Other Change to Development Permit for Multiple Dwelling

37 & 37A Arthur Street, Mermaid Beach

To: Council of the City of Gold Coast

Address: PO Box 5042 Gold Coast Mail Centre QLD 9726

Email: mail@goldcoast.qld.gov.au

Application: OTH/2025/18

Applicant: Cuecorp Property Group Pty Ltd

Subject Site: 37 & 37A Arthur Street, Mermaid Beach (Lot 23 RP41194 and Lot 1 RP85529)

1. Introduction

This submission objects to Development Application OTH/2025/18 on sound and legitimate planning grounds.

The application seeks approval for an Other Change to an existing development approval to facilitate an increase in residential density and modified built form outcomes on a constrained site within the Medium Density Residential Zone.

While the proposal has been amended during the assessment process, it continues to represent a significant departure from the planned outcomes envisaged by the Gold Coast City Plan and raises concerns regarding building height, density, landscaping, parking provision, neighbourhood character, residential amenity and strategic planning consistency.

For the reasons outlined below, the application should be refused.

2. Site and Planning Context

The subject site is located at 37 and 37A Arthur Street, Mermaid Beach and comprises approximately 527.4m² of land. The site is located within the Medium Density Residential Zone and is subject to a Building Height Overlay of 2 storeys and 9 metres.

The proposal seeks approval for:

- 6 x two-bedroom apartments;
- 1 x three-bedroom apartment;
- 4 storeys;

- Building height of approximately 13.19 metres;
- Basement parking;

Although reduced from the originally proposed five-storey plus roof top building, the development remains inconsistent with the planning intent for the site and locality.

3. Grounds of Objection

3.1 Inconsistency with Strategic Framework Outcomes

The Strategic Framework seeks development outcomes that:

- Reinforce neighbourhood character;
- Respect local context;
- Protect residential amenity;
- Provide appropriate transitions between built forms; and
- Contribute positively to the public realm.

The proposed development does not achieve these outcomes.

The scale and intensity sought is inconsistent with the established and intended character of Arthur Street and the surrounding residential neighbourhood.

The proposal relies heavily upon housing supply objectives and proximity to future light rail infrastructure. However, these broader policy objectives do not override the City Plan's carefully considered strategic planning framework.

3.2 Excessive Building Height

The City Plan anticipates a building height outcome of 2 storeys and 9 metres for the site.

Whilst the Strategic Framework allows for limited uplift where specific criteria are met, It can easily be determined that the proposal exceeds the intended uplift provisions and fails to satisfy the relevant assessment criteria.

The proposed development:

- Does not reinforce local identity and sense of place (City Plan 3.3.2 (9)(b));
- Does not provide an appropriate relationship with surrounding development (City Plan 3.3.2 (9)(c));
- Does not adequately respond to the reasonable amenity expectations of neighbouring residents (City Plan 3.3.2 (9)(c));
- Does not contribute positively to the local skyline (City Plan 3.3.2 (9)(d); and
- Has not rounded down to the nearest partial floor, which would be 3 levels (Refer City Plan 3.3.2 (9) Notes)

The proposed four-storey outcome effectively doubles the number of storeys contemplated by the planning framework and represents a built form outcome substantially greater than intended for the locality.

3.3 Overdevelopment of the Site

The subject site comprises only 527.4m².

The proposal seeks to accommodate seven apartments, basement parking, level 4 communal facilities and associated infrastructure within this constrained site.

The increased development intensity has resulted in:

- Increased site coverage;
- Increased building bulk and massing;
- Reduced landscaping opportunities;
- Reduced deep planting;
- Increased parking demand;
- Reduced separation opportunities between adjoining properties and;
- Increased overlooking of adjoining neighbours private open space areas.

The applicant expressly acknowledges that the increase from six to seven units was introduced to maintain project feasibility following reductions in building height.

Economic feasibility is not a planning ground that justifies departure from the City Plan.

The proposal represents an attempt to maximise development yield rather than achieve an appropriate planning outcome.

3.4 Loss of Deep Planting and Landscape Character

Council officers specifically raised concerns regarding the removal of frontage deep planting and the reduction of meaningful landscaping opportunities.

Deep planting performs an important role in Mermaid Beach by:

- Softening built form;
- Enhancing streetscape character;
- Providing urban cooling;
- Supporting biodiversity;
- Improving visual amenity; and
- Reinforcing the coastal landscape character.

The proposal substitutes genuine deep soil planting with planters and reduced planting opportunities resulting from the enlarged basement footprint.

This outcome fails to provide the same long-term environmental and visual benefits as meaningful deep planting.

3.5 Adverse Residential Amenity Impacts

The proposed increase in height and density has the potential to adversely affect neighbouring properties through:

- Increased visual bulk;
- Building dominance;
- Reduced outlook;
- Increased overlooking opportunities;
- Reduced privacy;
- Increased noise generation; and
- Increased activity associated with seven separate dwellings.

Council officers have already questioned whether the proposal adequately responds to the reasonable amenity expectations of nearby residents.

The cumulative effect of these impacts is inconsistent with the intended residential amenity outcomes for the locality.

3.6 Non-Compliance with Car Parking Requirements

The proposal fails to provide the minimum visitor parking required by the Gold Coast City Plan.

The development comprises:

- 6 x two-bedroom apartments; and
- 1 x three-bedroom apartment.

The City Plan requires:

Parking Type	Required
Residential Parking	9 spaces
Visitor Parking	3 spaces
Total	12 spaces

The proposal provides:

Parking Type	Provided
Residential Parking	9 spaces
Visitor Parking	2 spaces

Parking Type	Provided
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Total	11 spaces
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The proposal therefore contains a shortfall of one visitor parking space.

This shortfall will:

- Increase reliance on on-street parking;
- Reduce parking availability for existing residents;
- Increase parking conflict within Arthur Street;
- Increase traffic circulation associated with parking searches; and
- Diminish residential amenity.

The inability of the site to accommodate the required parking provision demonstrates that the proposed development exceeds the practical carrying capacity of the land.

3.7 Traffic and Transport Impacts

The increase in dwelling yield and associated activity will generate additional vehicle movements and visitor demand.

The parking shortfall will exacerbate these impacts and place additional pressure upon local streets.

Reliance upon future public transport infrastructure does not remove the requirement to provide compliant parking outcomes nor justify a departure from the City Plan.

3.8 Undesirable Planning Precedent

Approval of the proposal would establish an undesirable precedent for:

- Additional storeys above mapped building heights;
- Increased density beyond planned outcomes;
- Reduced landscaping;
- Reduced parking provision; and
- Incremental erosion of the Building Height Overlay and Residential Density Overlay provisions.

The fact that other approvals may have exceeded planning controls does not justify further departures from the City Plan.

Each application must be assessed on its individual merits and against the adopted planning framework.

3.9 Absence of a Demonstrated Planning Need

The applicant relies heavily upon housing supply objectives, the South East Queensland Regional Plan and proximity to the future Gold Coast Light Rail corridor to justify the increased density and building height proposed.

However, these matters do not establish a site-specific planning need.

The Gold Coast City Plan already identifies substantial areas of Mermaid Beach specifically intended to accommodate increased residential density and building height.

Of particular relevance, extensive areas of Mermaid Beach located:

- North of Hilda Street; and
- South of Seashell Avenue,

are designated:

- Residential Density RD5; and
- Building Height 3 Storeys / 15 Metres.

These precincts have been deliberately identified by Council as locations suitable for greater residential intensification.

Importantly, many of these RD5 precincts contain a substantial supply of older residential flat buildings, ageing duplex developments, lower-value redevelopment sites capable of accommodating urban regeneration and existing approvals ready for redevelopment.

These areas provide significant latent development capacity and represent the logical locations for future housing growth consistent with the City's strategic planning framework.

The existence of these extensive RD5 precincts demonstrates that the City Plan already provides substantial opportunities to achieve housing supply targets without requiring development outcomes that exceed the planning intent for lower-density areas such as the subject site.

The subject site remains designated:

- RD4 Residential Density; and
- Building Height 2 Storeys / 9 Metres.

The proposal not only exceeds the planning intent for the subject site but also exceeds density outcomes contemplated within nearby RD5 precincts.

The proposal contains:

- 15 bedrooms; and
- A site area of approximately 527.4m².

This equates to a density of approximately:

1 bedroom per 35.2m² of site area.

By comparison, RD5 density equates to:

1 bedroom per 50m² of site area.

Accordingly, the proposal achieves a density substantially greater than that contemplated within nearby RD5 areas that Council has specifically identified for higher-density residential development.

This is a highly significant planning consideration.

If development exceeding RD5 density outcomes is considered acceptable on RD4 land, the strategic distinction between the City's density precincts becomes significantly diminished.

The existence of a broader housing shortage does not create a planning need for every site to exceed the provisions of the planning scheme.

Rather, planning need must be considered in the context of whether the planning framework already provides sufficient capacity to accommodate the required growth.

In this case:

- Extensive RD5 land exists within Mermaid Beach;
- Those areas already accommodate greater height and density outcomes;
- Significant redevelopment opportunities remain available within those precincts;
- Many sites are of an age and value suitable for regeneration;
- The City Plan has deliberately directed growth to those locations; and
- The subject site has not been identified for comparable intensification.

There is therefore no demonstrated planning need that justifies departure from the City Plan.

The proposal represents a site-specific attempt to maximise development yield rather than a response to any unmet planning demand that cannot be accommodated elsewhere within Mermaid Beach.

4. Relevant Matters

The applicant relies upon:

- Housing supply objectives;
- The South East Queensland Regional Plan;
- Future Light Rail infrastructure; and
- Previous approvals that exceed planning controls.

These matters should be afforded limited weight.

The City Plan already provides substantial opportunities for additional housing within specifically identified growth areas. Housing supply objectives do not justify development outcomes that conflict with the planned outcomes for individual sites.

5. Conclusion

The proposal should be refused because it:

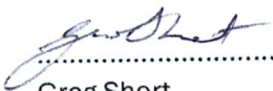
1. Exceeds the intended building height outcomes of the Gold Coast City Plan;
2. Fails to satisfy the criteria associated with the Building Height Overlay uplift provisions;
3. Is inconsistent with the Strategic Framework and Medium Density Residential Zone intent;
4. Represents overdevelopment of a constrained 527.4m² site;
5. Reduces meaningful landscaping and deep planting opportunities;
6. Creates adverse impacts upon the existing residential amenity;
7. Fails to provide the minimum visitor parking required by the City Plan;
8. Generates increased traffic and parking pressure within the surrounding locality;
9. Establishes an undesirable planning precedent;
10. Exceeds the density outcomes contemplated even within nearby RD5 precincts and;
11. Fails to demonstrate any compelling planning need that would justify departure from the City Plan.

Importantly, the applicant has not demonstrated any compelling planning need that would justify departure from the Gold Coast City Plan.

The existence of these appropriately planned growth areas in the near vicinity of the proposed development significantly diminishes any argument that the subject site must accommodate additional height and density to address housing supply objectives. The proposal therefore conflicts not only with the planning intent for the subject site but also exceeds the density outcomes anticipated for nearby higher-density residential precincts.

The proposal's inability to accommodate the required visitor parking spaces, maintain adequate deep planting and achieve compliance with building height provisions collectively demonstrates that the site is being developed beyond its practical carrying capacity.

For these reasons, Development Application OTH/2025/18 should be refused.



Greg Short

On behalf of Greg & Tina Short

Date: 11/6/2026