

Officer: Marc Cornell
Direct Telephone: 5475 9821
Our Reference: MCE:MCU17/0095
Your Reference: 16439

13 March 2018

SH Coolum Pty Ltd
C/- Project Urban Pty Ltd
PO Box 6380
MAROOCHYDORE QLD 4558

Dear Sir/Madam

Summary of Submissions

Sustainable Planning Act 2009

1 APPLICATION DETAILS

Application No: MCU17/0095, MCU17/0096 & REC17/0056

Proposal: Preliminary Approval for Material Change of Use of Premises to establish Yaroomba Beach Master Plan

Development Permit for Material Change of Use for Resort Complex, Multiple Dwellings/Short Term Accommodation & Shopping Centre, Educational Establishment, Community Use and Utility Installation

Development Permit for Reconfiguration of a Lot 1 into 26 lots (Creating 16 Dwelling House Lots, 2 commercial lots, 1 park lot, 1 access lot, 2 buffer lots, 1 transfer station lot, 1 principal body corporate lot & 2 balance management lots and access easement)

Street Address: David Low Way YAROOMBА

Real Property Description: Lots 12, 15 & 16 SP 238214
Lots 20, 336-340 SP 219217
Lot 25 SP 269561

Planning Scheme: Sunshine Coast Planning Scheme (27 February 2017) & Maroochy Plan 2000 (24 October 2011)

2 SUBMISSIONS SUMMARY

Council has completed processing a total of 12,326 submissions in relation to the application. Of these, 11,692 were properly made submissions and 634 were not properly made submissions.

Council officers have reviewed the content of the submissions. 9,306 submissions were received opposing the development, 3,000 submissions were received in support of the development and 20 submissions did not provide a position.

The table below includes a preliminary list of the matters raised in the submissions, both in support and in opposition to the proposed development.

SUBMISSIONS INDICATING OPPOSITION OF THE DEVELOPMENT
<p>Density</p> <ul style="list-style-type: none"> • The proposed density represents a significant over-development of the site and cannot be justified • The application cannot be considered to be a tourism-focused development in line with expectations under the planning scheme. The hotel's setting within a high-density residential estate is not the style of resort desirable for Yaroomba, and would likely compromise its function and role in the local tourism sector and viability • Yaroomba was never identified as a major new growth/development area or as a priority investment area • Construction of approximately 1,000 dwellings will have a detrimental impact on the amenity of the surrounding area • The scale of the development & density far exceeds the town plan and does not sensitively respond to the physical (low rise) characteristics of the area and does not connect to the urban fabric of the area
<p>Building Height</p> <ul style="list-style-type: none"> • The development exceeds the planning schemes 2 storey/8.5m height limit • The proposed high-rise and intensive development conflicts with the Coolum local plan code and the Height of Buildings and structure overlay code as <ul style="list-style-type: none"> ○ the scale and density of this development is directly and comprehensively in conflict with the expectations outlined as low key and sitting lightly on the landscape ○ the development will detract rather than enhance the beachside character of the area • The heights proposed do not meet the reasonable expectations of the community for a low level, low key development • The proposed building heights should only be supportable in primary centres identified under the Sunshine Coast Planning Scheme 2014, such as Mooloolaba and Maroochydore <ul style="list-style-type: none"> • Concern that future applications will request additional 7 storey buildings on other parts of the site if approved
<p>Impacts on Scenic Amenity/Character of the Area</p> <ul style="list-style-type: none"> • Views from Mount Coolum, beaches, parabolic high dunes, coastal headlands (Point Arkwright/Lows Lookout) and the ocean, and vistas from Mount Ninderry and the Buderim Escarpment are all regionally significant landscape features and should be protected. • The development will be highly visible from other key viewpoints including Buderim, Mt Ninderry and the hinterland • The proposed development impacts on scenic amenity and conflicts with the coastal corridors character

<ul style="list-style-type: none"> The development is not consistent with the established low-key coastal residential area and identity of the community or area
<p>Preliminary Approval Document</p> <ul style="list-style-type: none"> The proposed development is essentially seeking a wholesale re-write of the applicable codes to create the 'Yaroomba Beach Site Development Code' in an effort to demonstrate 'acceptable solutions', which is unacceptable and demonstrates the extent of the departures from the Sunshine Coast Planning Scheme 2014
<p>Open Space</p> <ul style="list-style-type: none"> The park proposed in the development is only 0.6 ha and not in balanced ratio with the expected very busy and high density buildings and 7 storey apartments and hotel that would share this space and would not meet the needs for shared public use The serviced apartments do not provide sufficient private open space
<p>Flora/Fauna</p> <ul style="list-style-type: none"> Development of this size and density will significantly impact on resident and migratory fauna inhabiting the publicly owned bushland and foreshore reserves to the north and south of the site Groundwater dependant ecosystems, both flora and fauna, will be significantly impacted There has been inadequate assessment of groundwater matters as part of this proposal e.g. no direct assessment of groundwater recharge rates and no direct assessment of aquifer hydraulic conductivity undertaken as part of the recent investigations and consideration of climate variability There are likely impacts on fauna and habitat values of foreshore reserve and inadequate setbacks to this environmental reserve Inadequate flora and fauna surveys have been undertaken for the site during the most appropriate weather conditions for the targeted species
<p>Acid Sulphate Soils</p> <ul style="list-style-type: none"> Proposed excavation for basement car-parking, trunk infrastructure and associated works heightens the risk of mobilising acid sulphate soils and a drawdown/dewatering of the groundwater aquifer on and potentially adjacent to the site
<p>Turtles</p> <ul style="list-style-type: none"> This proposed development would significantly disrupt breeding and hatchling behaviour of the area's endangered Loggerhead and vulnerable Green Turtles, regardless of the proposed 'safeguards' in lighting etc, through the sheer density of use of what is currently a low-key, unspoiled and dark beach It is the developer's responsibility to refer the application to the Federal Government under the Environment Protection and Biodiversity Conservation Act 1999, as a result of threat to endangered species Request to consult with Dr Col Limpus, Chief Scientist from Department of Environment and Heritage Protection (State Government) as he is world renowned for his studies in marine turtles

- There is no ability to restrict residents and guests gaining access to beach at night with own lighting devices

Traffic and Access

- Impacts of the development on local traffic have been underestimated
- The development will result in significant traffic congestion at key intersections in the area including
 - David Low Way
 - David Low Way and Beach Road Intersection
 - Suncoast Drive and David Low Way
 - David Low Way and Tanah Street
 - School Road and South Coolum Road Intersection
- The proposed upgrades suggested are not feasible and would not address the traffic impacts and some upgrades will impact on existing visitor parking
- The local road network will not be able to adequately accommodate the traffic anticipated by 2027

Car Parking

- Inadequate parking is provided for the residential and commercial development
- There is no provision for event parking (other than temporary arrangement)
- The development will worsen existing parking problems in and around Coolum

Coastal Protection

- The proposal would degrade the frontal and parabolic dunal systems
- There is not enough room for population and additional people on the beaches created by the development, forcing them into the dunal system

Flooding

- The vulnerability of this site to climate change impacts has not been addressed in the application material
- The proposal does not address climate change and rising sea levels and creates potential liability for Sunshine Coast Council due to property damage
- The development will have flooding impacts on properties external to the site

Bushfire

- There is inadequate separation between the development and the coastal foreshore reserve to protect the development from bushfire threat

Coastal Pathway

- The proposed development does not show the coastal pathway in accordance with the Coastal Pathway Master Plan adopted by Council in December 2017

Cultural Heritage Matters

- Lack of assessment and consultation with Kabi Kabi First Nation Peoples regarding Aboriginal or historic cultural heritage
- The application has not provided an updated extensive cultural heritage management plan under the guidelines of the *Aboriginal Cultural Heritage Act 2003*

Economic Impacts

- The economics should not be used as a main reason to decide to change the Planning Scheme
- The economic assessments to determine the benefit to the community are likely to have overestimated the value by at least 17% due to inclusion of Noosa Shire and possible other errors
- The economic value of the residential development is also likely to be overvalued and generally not relevant to contribute extra to the economy because there is a limit to new arrivals / demand
- The application does not note other existing 5 star rated hotels, or a possible resurgence of the Palmer Coolum Resort
- The application has provided a flawed analysis of economic benefits i.e. overestimate of benefits and lack of assessment of economic impacts
- The development will have a detrimental impact on local businesses
- The development will adversely affect tourism in the area (by changing character of area)
- The development will degrade the Coast's competitive advantage
- The development does not meet need for a high-quality resort in coastal setting
- The proposed hotel would be compromised by existing high-density residential estate
- No certainty that the hotel component will be delivered/maintained
- Viability of the 5 star resort is questionable

Inconsistency with Sunshine Coast Council Policies

- The proposal does not align with any of the Sunshine Coast's statutory, policy or strategic instruments (e.g. 3.8.1 (d)(f) of Strategic Framework)
- The proposed development does not align with tourism-focused expectations under the Scheme and other guidelines
- Approval of the development sets a 'dangerous' precedent for future proposals that conflict with Sunshine Coast Planning Scheme 2014 under s.329 of SPA

Community Benefit

- This proposal is not focused on tourism, but is substantially a residential development with a very small tourism component
- Tourism employment is not a sufficient reason to agree to significant non compliances
- There does not appear to be an urgent need to attract a 5 star resort to the Sunshine Coast because others already exist, including potentially the adjacent Palmer Coolum Resort
- The Maroochydore City Centre has been identified for a premium hotel

- The tourism component is only a minor component to the overall residential development
- The development should occur on the Palmer Resort site

Other matters

- A sustainable and considerate low-rise eco resort across the entire 19ha site would be much more appropriate, and in line with the environmental amenity and character of Yaroomba
- The proposal will not align with the Sunshine Coast's natural competitive advantage
- The application community engagement process was flawed and the advertising of the development is misleading to the community
- The development will detrimentally impact on surrounding property values
- The development will impact on local property prices due to the oversupply of cheap low quality units
- The development will increase noise impacts to adjoining and nearby residential areas given intent to hold events at the resort
- Properties were purchased on the basis of existing town plan. Compensation would be sought if the development is approved
- The development is not able to accommodate the development in the context of the local infrastructure and services such as water, sewer, power and schools
- There is a need to keep the beaches natural for future generations
- Yaroomba Beach is dangerous and not suitable for overseas visitors and therefore a resort. There will be more drownings despite lifesavers
- There will be many more dogs on the beach as a result of the increase in population
- The Hyatt Resort was approved on the condition that the land east of David Low Way would remain as open space
- Request for the Coolum area to join Noosa Council

SUBMISSIONS INDICATING SUPPORT OF THE DEVELOPMENT

Economic investment benefits

- The development will provide a \$120 million boost to the local economy every year
- The development will provide 5 Star Ecotourism opportunities
- The development will provide the first 5 star hotel in 30 years with entertainment and leisure facilities that will bring events and conferences back to the Coast
- The 5 Star Westin Coolum Resort & Spa will provide a standard of accommodation and conference facilities that has been missing in the region for some time since Hyatt (Palmer) Coolum closed
- The development will deliver a competitive advantage in tourism while providing the local community with improved amenity, including green and open public space and access to lifestyle facilities
- The development will accommodate 90,000 new visitor nights per year
- The development will provide flow on effects for small business that will supply services on year on year basis
- The development will increase residential and commercial property value growth
- The development will assist in attracting other private sector investment to the region
- The development will support the infrastructure decisions of Sunshine Coast Council and demonstrates the investment readiness of the region

- The International resort chain will put Sunshine Coast on the map internationally
- Given the ageing list of hotels, accommodation units & tourist attractions the development will provide more modern luxury accommodation
- The development will provide tourist accommodation in proximity to the Sunshine Coast Airport to coincide with increase in visitors due to expansion
- Council will spend millions on the new airport but without world class attractions and accommodation, overseas tourists may visit other destinations
- The proposal sits within a 'Tourism Focus Areas' (tourism precinct). The proposal is consistent with this intent

Environmental Benefits

- The development will achieve a superior sustainable and ecological outcome with more preservation of vegetation compared to the current approval
- The environmental credentials displayed within this application are global best practice and worthy of international recognition
- Other far more significant beachfront parcels have been (and are being) developed with significantly less focus on environmental sustainability
- The development will provide large amounts of green space and should fit into the natural surrounds once completed
- The development respects the hydrology, vegetation and natural character of the site while protecting views and vistas from surrounding areas
- Due to long expanse of beach, the proposal is unlikely to significantly impact on turtles coming to lay their eggs. Turtle nesting is impacted across the whole Sunshine Coast and turtle nests at Yaroomba Beach directly in front of this project are less numerous than other places where developments has occurred
- There will be zero overshadowing of the beach caused by the buildings
- The building tops will not be seen from the waterline at the beach
- The key view lines are not adversely effected by the proposal

Community Benefits provided by the development

- Landmark resort and facilities
- Venue for arts and cultural events
- New village hub for everyone in the region to share, enjoy and visit.
- Public access to beach and other natural areas is maintained for locals and visitors
- 6,000m² of public park space for the community
- 3.3 ha park, lake and pathways to be transferred to Council for public use
- Restoration of Surf Life Saving Patrols to Yaroomba Beach
- Increase provision of community amenities/services
- Coastal Discovery Centre for the promotion of the region's beach ecology and indigenous history
- Inclusive and accessible for visitors, employees and residents with a range of disabilities

Employment

- The development will provide 360 new and ongoing jobs on site, backed by training partnerships with TAFE
- The development will provide 1400 ongoing jobs across the Sunshine Coast

- The development will provide over 400 construction jobs per year across a 9 year construction period with procurement plan to maximise involvement of local trades and suppliers equating to \$26 million in wages for construction workers over the 9 year staged development
- The development will provide diversification of the Sunshine Coast workforce
- The development will provide immediate and long term jobs, particularly for youth in hospitality
- The development will provide jobs for a high unemployment area

Housing Diversity

- The development will provide a diversity of housing near existing amenities and services that meets the current and future needs of the community

Transport

- The development is in a suitable location on a main road, close to the Sunshine Coast Airport and Yaroomba Beach
- Traffic conditions will be improved due to infrastructure gains as a result of the project
- Less peak hour traffic from a resort compared to a large residential community
- Basement parking provided, but also a focus on self-transport including bicycles

Other matters

- Further development of gated communities (as what exists further south of the site) will prevent the general public from being able to access the long stretch of unpatrolled beach
- The development is in line with the Sunshine Coast vision to be Sustainable, Green and Diverse, growing in line with the airport expansion, Maroochydore CBD and Health Hub

All the submissions lodged in support and objection to this application, including the matters outlined in the above summary, will be considered in the assessment process. All submissions are available to view on PD-online and provide greater detail on each specific matter raised.

Should you require any further information, Council's Customer Engagement and Planning Services Group may be contacted on the above telephone number.

Yours faithfully



PATRICIA JENSEN
MANAGER DEVELOPMENT SERVICES