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15 June 2020

Cr Mark Jamieson
Mayor Sunshine Coast Regional Council (SCRC)

A/CEO Mr. Warren Bunker

cc. Councillors Divisions 1-10 SCRC

Email: mail@sunshinecoast.qld.gov.au

Dear Cr Jamieson, Mr Bunker and Councillors

RE Intense residential development proposed outside the urban footprint at Coolum West

On 4 June a consortium of concerned community groups wrote to the Minister for State Development, Tourism and Innovation, Kate Jones, MP, seeking an urgent meeting regarding the Consolidated Properties proposal for Coolum West. A copy of the letter to the Minister is attached for your information.

The concerned groups and their Presidents and representatives are:

- Coolum Residents' Association (CRA) - Mr. Ray Barber
- Surfrider Sunshine Coast - Mr. Steve James
- Development Watch - Ms. Lynette Saxton
- Friends of Yaroomba – Mr. Daryl Maudsley
- Sunshine Coast Environment Council (SCEC) – Ms. Narelle McCarthy
- Organisation of Sunshine Coast Association of Residents (OSCAR) - Ms. Melva Hobson

As umbrella organisations, member groups of both OSCAR and SCEC also have concerns regarding the proposed development of the floodplains at Coolum West. As a result of our meetings with the developer and ongoing discussion with him by SCEC, it has become apparent that Consolidated Properties (the developer) is intent on pushing ahead with this proposal for an intense residential development and mixed-use activity incorporating a "wave pool". Any development of these floodplains is of grave concern not only to OSCAR and SCEC, but also our member groups who represent the residents of Coolum and surrounding localities on the Sunshine Coast. We are also aware this proposal is of great concern to Council as referenced below. Given these shared concerns, opportunities to support joint advocacy efforts to the State Government would be timely and welcome. We are in the process of developing a detailed submission in preparation for our requested meeting with the Minister. A copy of that submission will be forwarded to SCRC. The following is a summary of concerns shared by our respective groups-

Planning Context

1. The 510ha parcel over which the proposal sits is entirely within the Maroochy River floodplain and catchment. It is zoned 'Rural' and outside the Urban Footprint in the 2017 South East Queensland Regional Plan (SEQR/Planning SEQ).
2. For all intents and purposes, what appears to be proposed is primarily an intense residential and mixed-use development with a much touted "wave pool" as just one component. The developer has made it clear to us there will be no wave pool without the intense residential and mixed-use development. This proposition should not be entertained nor contemplated.

Site Characteristics, Constraints and Values

3. The characteristics of the site within the floodplain with its associated hydrology, plus the intention, as indicated by the developer, that the water for the wave pool is to be extracted from the nearby Maroochy River; a river which has high ecological, social and amenity values, makes the location unacceptable for this proposed development.
4. The site is entirely within the Maroochy River floodplain and is subject to tidal flow, permanent standing water, flooding and tidal inundation. It also contains acid sulphate soils.
5. It is in the area designated by the Sunshine Coast Regional Council (SCRC) as the “Blue Heart” – Blue Carbon initiative¹.

This is a State Government, SCRC and Unity Water initiative covering more than 5000 hectares in the Maroochy River Catchment. This initiative will help to ensure that we maintain sustainable landuse practices on the Maroochy River floodplain and preserve this catchment for its intended purpose in the face of a changing climate ((Mayor Mark Jamieson’s response to OSCAR LG election 2020 questionnaire).

6. A project such as currently proposed by Consolidated Properties would irrevocably undermine and negatively impact on the considerable merits of the Blue Heart.
7. It is in close proximity to Unity Water’s Yandina Creek wetlands, used for nutrient offsetting through the regeneration and restoration of wetlands.
8. The role and vulnerability of the Maroochy catchment and floodplain has been recognized by the Queensland State Government when it endorsed the inclusion of fluvial processes in the development of the Coastal Hazard Adaptation Strategy (CHAS) for SCRC.
9. The developer has indicated that he intends to “fill” extensive areas. The concept of “no worsening of flood risk” has already been identified as problematic with another proposed urban development on the floodplain. Associated with this is the “right to fill” of *existing* residential property owners within the catchment.
10. The Defined Flood Event (DFE) in this area is around 3.0mAHD. Floor levels for most development have to be 0.5m above the DFE. Given almost all of the development site is below 1.0m AHD, this will require around 2.5m of fill for building sites, and around 2.0m of fill for access roads. Estimates based on the concept plans suggest over 2 million cubic metres of fill would be required. This amount of fill will obviously affect the flood storage capacity of this catchment.

Wave pool

11. Our member groups do not necessarily have an issue with the concept of a wave pool per se BUT in the right place and as a stand-alone ecologically sustainable facility. Coolum West, for many reasons as outlined herein and provided in detail in our submission, prior to any meeting with the Minister is NOT the right location.
12. In OSCAR’s recent candidate survey for the March 2020 Local Government elections, the following question was asked:
“Do you support the proposed Coolum West intense residential/mixed use development and wave pool proposal on significantly constrained land, which is also outside the Urban Footprint?” Mayor Mark Jamieson stated in his response:

“I am on the public record stating that I think a surf ranch would be a great tourist addition to our region – in the right place. Given what is proposed with the surf ranch on the site at Coolum West – which is within our Blue Heart – the location is not the right place. The Queensland Government, which is the body responsible for considering this proposal (not Council) has already been made aware of Council’s views in this regard.”
13. The wave pool concept has been marketed to the community as a facility for both the general and elite surfing community. When questioned about the general use of the wave pool it was made clear that this facility is not something that a “tradie” or any recreational surfer can drop into on the way home from work or their time of choice.

¹ <https://www.sunshinecoast.qld.gov.au/Council/Planning-and-Projects/Major-Regional-Projects/The-Blue-Heart>

14. When asked about pricing, the representative of WSL was obtuse and observations were noted that hiring such a facility could cost in the vicinity of US \$50000 per day.

Conclusion

The key planning issues with the development are:

- Existing Rural Zoning under the planning scheme.
- Regional Landscape and Rural Protection Area designation under the SEQ Regional Plan.
- Multiple State Planning Policy matters:
 - Acid Sulphate Soils over the entire site
 - Important Agricultural Area and Agricultural Land Class A and B
 - Key Resource Area for sand (KRA156), plus separation area and transport route, covering a significant portion of the site.
 - Erosion Prone Area.
 - High Storm Tide Inundation Area.
 - Some areas of High Ecological Significance Wetlands and Regulated Vegetation (Essential Habitat).
- **Flood Hazard Area under the planning scheme (the entire site is subject Current Climate Riverine Flooding).**

This proposal is clearly inappropriate and should not be progressed. Furthermore, any consideration of such a project must not exclude the community or be devoid of proper and transparent processes – a situation that is becoming increasingly and unacceptably evident and one we seek to have addressed by the state as a matter of urgency.

Representatives of the consortium would like to meet with the Mayor, A/CEO and Cr. Maria Suarez as the Divisional Councillor to discuss the process related to this proposal.

The proposal is clearly an example of urban sprawl with a wave pool as a secondary or “selling” point but spuriously promoted as a tourism project. The developer previously applied for a canal estate development some years ago. That development was not supported by the then Council and State Government and was refused. Our members will be requesting the State government take the same stance and refuse such an incompatible and unpopular development of these vital floodplains.

We look forward to meeting with you and discussing these issues of concern to both SCRC and our community, at your earliest convenience.

Yours sincerely

Melva Hobson PSM

Narelle McCarthy

President OSCAR

Advocacy and Liaison Officer SCEC

on behalf of:

- Coolum Residents' Association (CRA) - Mr Ray Barber
- Surfrider Association - Mr Steve James
- Development Watch - Ms Lynette Saxton
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