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12 August 2020

The Honourable Annastacia Palaszczuk

Premier of Queensland

Email: thepremier@premiers.qld.gov.au

Dear Premier

Re: Proposed residential/mixed use/wave pool development by Consolidated Properties at Coolum West, Sunshine Coast.

On behalf of the members of the groups listed below, we thank you and your government on the response to the COVID-19 pandemic and the actions you have taken to date to protect Queenslanders across the state. We appreciate the need for governments at all levels to ensure that all opportunities for economic and social recovery are explored.

While acknowledging the government's actions and programs so far, we would ask that the same level of concern for the community and the environment of the Coolum and wider Sunshine Coast community be expressed in relation to the proposed residential/mixed use/wave pool development proposed by Consolidated Properties.

This letter is written on behalf of the Community 6, a consortium of groups of concerned residents, representing some 15000 people across the region. Three of the groups represent the interests of Coolum and surrounds while, the Surfrider Foundation Sunshine Coast, Sunshine Coast Environment Council (SCEC) and the Organisation Sunshine Coast Association of Residents (OSCAR) are peak bodies representing the broader Sunshine Coast and Noosa Region. The concerned groups and their representatives include:

- Coolum Residents' Association (CRA) - Mr. Ray Barber
- Surfrider Foundation (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.

The groups listed above wish to make representation to you in relation to the above proposed development at Coolum West. The following is a list of the planning, environmental and human constraints of this proposal at this site. A more detailed commentary as presented to Minister Jones is attached for your interest.

Planning Context

- 1 The 510ha parcel over which the proposal sits is entirely within the Maroochy River floodplain and catchment. It is zoned 'Rural' under the Sunshine Coast Planning Scheme 2014 (a consistent zoning carried through from earlier local planning instruments)
- 2 The site has Regional Landscape and Rural Protection Area designation and outside the Urban Footprint under the SEQ Regional Plan 2017(SEQRP/Shaping SEQ)
- 3 It is a Flood Hazard Area under the Sunshine Coast Planning Scheme 2014 (the entire site is subject to Current Climate Riverine Flooding)
- 4 For all intents and purposes, what is 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 that there will be no

wave pool without the intense residential and mixed-use development. This proposition should not be entertained nor contemplated.

- 5 Multiple State Planning Policy matters surrounding the site at Coolum West including:
 - i. Acid Sulfate Soils (ASS) over the entire site.
 - ii. Important Agricultural Area and Agricultural Land Class A and B
 - iii. Key Resource Area for sand (KRA156), plus separation area and transport route, covering a significant portion of the site. The sand from this KRA is deemed important for regional supply.
 - iv. Erosion Prone Area.
 - v. High Storm Tide Inundation Area.
 - vi. Some areas of High Ecological Significance Wetlands and Regulated Vegetation (Essential Habitat).
6. We have seen advice sent to a resident from the Treasurer and Minister for Infrastructure and Planning, that under the SEQRP 2017 (*Shaping SEQ*), the proposed residential development and shopping centre are prohibited development on this site.

Site Characteristics, Constraints and Values

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 Coolum Creek a tributary of the Maroochy River; a river which has high ecological, social and amenity values, makes the location unacceptable for this proposed development.

The Maroochy floodplain has significant vegetation communities which are Groundwater Dependent Ecosystems. These include the largest stand of *Casuarina glauca* in Australia which has recently been listed as nationally endangered - Coastal Swamp Oak (*Casuarina glauca*) Forest of South-East Queensland and New South Wales; Subtropical and Temperate Coastal Saltmarsh community which is EPBC listed as critically endangered; and a threatened population of endangered water mouse (*Xeromys myoides*). A full ecological study over time of the impact of any of the proposed changes to the floodplain should be undertaken before any consideration of development or any similar activity on any part of the Maroochy floodplain.

It is in the area designated by the Sunshine Coast Regional Council (SCRC), in conjunction with the Department of Environment and Science and Unity Water 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).

A project such as currently proposed by Consolidated Properties would irrevocably undermine and negatively impact on the considerable merits and future tourism opportunities of the Blue Heart.

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.

The developer has indicated that he intends to “fill” extensive areas. The concept of “no worsening of flood risk” and associated “right to fill” of *existing* residential property owners within the catchment has not been given due consideration by the developer. It is estimated from the preliminary concept plans that over 2 million cubic metres of fill would be required to meet Q100 requirements. Given the existing and extreme vulnerability of the site to weather events and climate change, it is conceivable that an even greater volume would be warranted. This in itself provides a strong basis for rejecting this site for any urban development.

Wave pool

As discussed, 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 is NOT the right location.**

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

The SCRC Mayor Cr Mark Jamieson has clearly presented SCRC's view re this proposal: ***"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."***

The wave pool concept has been marketed to the community as a facility for both the general and elite surfing community. This is clearly not the case as we hear from members who are part of the surfing community that any use of the facility is well beyond the ability of surfing families to pay.

We respectfully suggest that the government carefully interrogate the "survey" conducted by KPMG on behalf of the developer not long after the announcement of the proposed wave pool and where information relating to the urban development was not generally known nor described. We are concerned not only with the conduct of the online survey as well as how people who objected to the proposal were summarily 'blocked' from making any comments. We would also suggest that the number of 500 respondents is evidence of the developer's aim to "get in early before people knew the full details of the proposal."

Jobs claims

Similarly we would expect the developer to articulate the actual number of full-time jobs at various stages of the proposed development. Formulas used multiplying the development spend by a factor as indicated by the developer often do not reflect an accurate picture and often used to make a project appear more attractive. The government will recall that such exaggerated jobs claims by a prominent development in Central Queensland were exposed during court proceedings². . . Given the significant site constraints, planning conflicts and complexities, this project is certainly not 'shovel-ready' and any jobs, should they materialise, are several years away.

Conclusion

We have been advised that the developer is proposing to submit an application for Priority Development Area (PDA) declaration, under the Economic Development Act 2012 for the subject lands.

We also understand that some of the developer's construction partners maintain that the proposal is 'shovel ready'. As stated above, the assessment required to be undertaken by the state and the community consultation required under the Act, the project would be looking at considerable time for this to occur and that is without allowances for the State election in October 2020. Furthermore, the responsibility and costs for the necessary and comprehensive assessments and obligations (and risks) for any Development Scheme would largely be borne by the state.

This proposal is entirely inappropriate and should not be progressed. The State should not expend any funds and time on this proposal.

We understand the State Government has increased its focus on economic stimulus and employment opportunities owing to the COVID-19 Pandemic. We are also aware that a bid has been made for the 2032 Olympic Games to be held in Queensland. The state boasts many natural attributes and attractions making it appealing for tourism and as a Games host. The questionable viability and sustainability of a manufactured wave pool as peripheral infrastructure to an intensive mixed-use urban development is completely at odds with the celebrated 'Natural Advantage' of the Sunshine Coast tourism brand. Supported by scientific and planning evidence, we maintain this proposal at this site is not in the interests of the Coolum community, the Sunshine Coast region nor the short or long-term future of the State.

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 in 2004. That development was not supported by the then Council and State Government and was refused. Our members are requesting the State Government take the same stance and refuse such an incompatible, unpopular and unsustainable development of these vital floodplains

Premier, a meeting to discuss this significant regional matter and the supporting submission as a matter of urgency would be greatly appreciated.

² [https://envirojustice.org.au/sites/default/files/files/171130%20EJA%20ltr%20to%20ACCC%20\(Adani%20jobs%20claim\).pdf](https://envirojustice.org.au/sites/default/files/files/171130%20EJA%20ltr%20to%20ACCC%20(Adani%20jobs%20claim).pdf)

Yours sincerely

Melva E Hobson.

Melva Hobson PSM
President OSCAR

on behalf of:

- Coolum Residents' Association (CRA) - Mr Ray Barber
- Surfrider Foundation - Mr Steve James
- Development Watch - Ms Lynette Saxton
- Friends of Yaroomba – Mr Daryl Maudsley
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