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Mail: PO Box 105
Coolum Beach QLD 4573

Email: mail@oscar.org.au

21 September 2020

The Director General
Mr Damien Walker

Department of State Development, Tourism and Innovation

Email: info@dsmip.qld.gov.au

Cc: please forward this letter to the Executive team following:

Ms Tess Bishop, DDG Economic policy and Communications

Ms Toni Power, Coordinator-General

Mr Michael Mckee DDG Corporate

Mr Jason Camden A/GM Economic development Queensland

Dr Sarah Pearson DDG Innovation

Mr Michael Carey A/DDG A/DDG Investment Facilitation and Partnerships

Ms Michele Bauer DDG State Development

Mr Jeff McAlister DDG Tourism and Major Events

Mr David Edwards Project CEO, Tourism development projects Division

Dear Mr Walker and other members of the State development, Tourism and Innovation Executive Leadership Team

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

This letter is written on behalf of the 'Community 6', a consortium of groups of concerned residents, representing some 15000 people across the Sunshine Coast. 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 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.

We wish to draw your urgent attention to the above proposed development at Coolum West. We are very concerned and somewhat surprised that the developer, Consolidated Properties is seeking a PDA declaration for this site and project. The following is a summary list of the planning, environmental and human constraints of this proposal at this site, which we hope that your officers have drawn to your attention. Furthermore, it should not be considered in the context of a 'COVID-19 recovery' project given that it would not deliver the touted and exaggerated jobs or economic benefits for many years, if ever. A more detailed commentary as presented to both Minister Jones and the Premier 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 or contemplated.
- 5 Multiple State Planning Policy matters surrounding the site at Coolum West including:
 - i. Acid Sulphate 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 intended for regional use.
 - 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 (DES) 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.

¹ <https://www.sunshinecoast.qld.gov.au/Council/Planning-and-Projects/Major-Regional-Projects/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/coincident flooding in the development of the Coastal Hazard Adaptation Strategy (CHAS) for the Sunshine Coast Regional Council (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. Our estimate suggests over 2 million cubic metres of fill would be required.

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 do not reflect an accurate picture and are often used to make a project appear more attractive. The developer should also indicate the number of long-term jobs available to local residents as construction jobs by their very nature are short term and often transitory. 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.

Wave pool

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. It is NOT supported by the Sunshine Coast Regional Council.

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 the developer not long after the announcement of the proposed wave pool and where information relating to the urban development was not generally known. We are concerned with the conduct of the survey and how people who objected to the proposal were summarily dismissed from making any comments. We would also suggest that the number of 500 respondents was evidence of the developer’s aim to “get in early before people knew the full details of the proposal.”

The developer has confirmed that he has not made a formal application to the State Government for a Priority Development Area (PDA) declaration under the Economic development Act 2012, however his spokesperson commented via the Courier Mail that government approval of a PDA is “imminent”!

We also understand that some of the developer’s construction partners maintain that the proposal is shovel ready. One wonders how such a statement could be made when it is our understanding that at this point in time no flood modelling has been undertaken by the developer.

Clearly given the assessment required to be undertaken by the State and the community consultation required under the Act, such a claim is a nonsense.

Recently we received an email originally sent from the developer’s office to a range of people who were assumed to be supportive of the proposal that included the following statement from one of the key landholders:

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)

From: Jay Chandler <jaychandler@bigpond.com>
Date: 13 August 2020 at 9:19:27 pm AEST
To: Jay Chandler <jaychandler56@gmail.com>
Subject: Fwd: Surf legend Kelly Slater urges green light for \$1.2b Qld wave pool project

Hello friends

I'm forwarding this email on to you as you probably know of our association with Consolidated Properties who are proposing to build the Kelly Slater Surf Ranch on our ex sugarcane farm at Coolum.

I have been working with Don O'Rorke, the head of Consolidated Properties, for 17 years as we have gone through the trials and tribulations of trying to get approval for the redevelopment of our land.

Consolidated Properties has the Wave Pool proposal before the Queensland State Government and is awaiting it's imminent (sic) decision.

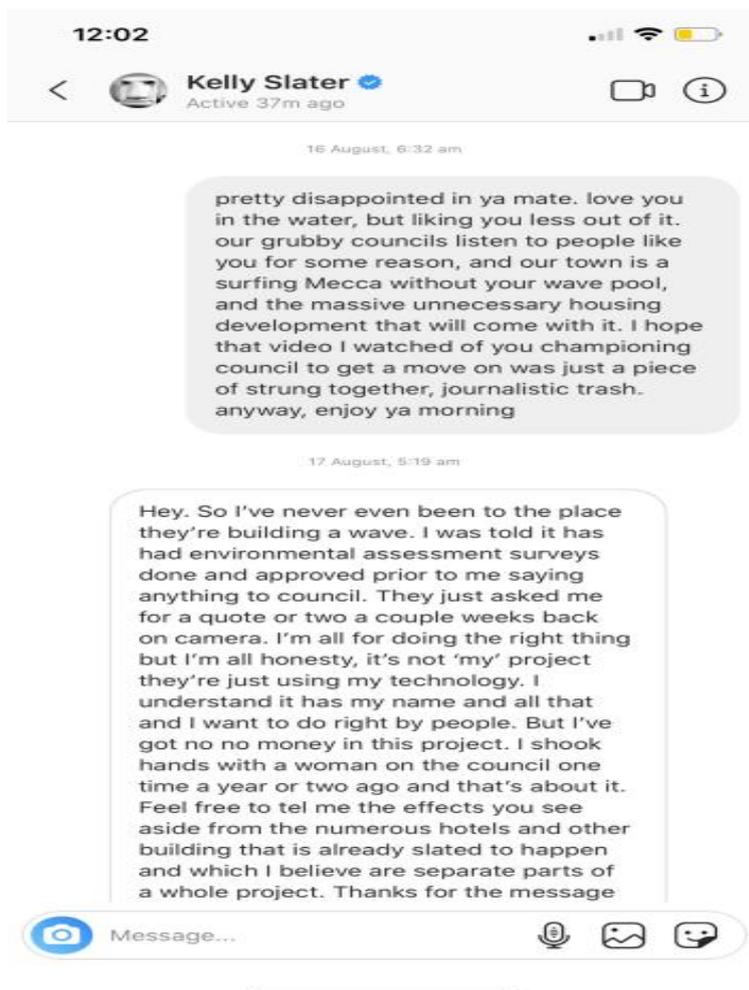
We need all the support we can muster to demonstrate to the politicians that employment generating projects are necessary in the current climate.

Jay Chandler

This email was sent to a prominent surfer on the Sunshine Coast who does not support the proposal. The developer seems to think that the surfers are backing him, but they have seen through the hype and recognize that this is about residential development, something the landowner has been seeking for 17 years. The wave pool is just "a means to an end."

Note: this email has not been provided to anyone other than the recipients of this letter.

We note that the Greg Stoltz article in the Courier Mail pushing this unsustainable development quoted Kelly Slater. A discussion between a Sunshine Coast surfer and Kelly Slater on Instagram elicited the following response from Kelly Slater: (Please note that Kelly is probably referring to the visit of Minister Jones last year to Lemoore wave pool in the States, not the Sunshine Coast Regional Council.)



Looking to the future

The State Government has been and is very active in promoting renewable energy. This is acknowledged and applauded. As we look into a future of increasing risk owing to climate change and the imperative to take action to reduce emissions and mitigate same, the State Government is to be applauded through DES, along with Sunshine Coast Regional Council (SCRC) and Unity Water for the development of a Memorandum of Understanding (MOU) establishing the Blue Heart Project at Coolum West.

This innovative project covering 5000 hectares of the Maroochy floodplain with practical outcomes, research, carbon sequestration through marine environments and landuse opportunities with Blue Carbon storage is a legacy that will have greater constructive impact on our state and community than any residential and wave pool development. It would be short-sighted of any government to allow a development proposal by an individual/or company to jeopardise such an innovative project as the Blue Heart Project on the Maroochy Floodplain.

Conclusion

This proposal is entirely inappropriate and should not be progressed. The State should not expend dollars and time on this proposal. We find it somewhat offensive that a developer would consider expecting the State to skirt the planning rules for private financial gain under the guise of economic development.

We appreciate that the State Government is looking for economic opportunities for support in this time of high unemployment and uncertainty owing to the COVID-19 Pandemic. We are also aware that the State has made a submission to the International Olympic Committee for the 2032 Olympic Games and that a wave pool may have some attraction to the Government for this and other tourism events. However, we are also aware that all the known Olympics locations in the foreseeable future are using natural environments for surfing events. Surely Queensland would take advantage of the surfing beaches for future surfing events.

With due respect we maintain, and supported by scientific and planning evidence that this proposal at this site is not in the interests of the Coolum community, the Sunshine Coast region or 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.

Yours sincerely



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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