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4 January 2021

The Honourable Meaghan Scanlon MP

Minister for the Environment and the Great Barrier Reef and Minister for Science and Youth Affairs

Email: [environment@ministerial.qld.gov.au](mailto:environment@ministerial.qld.gov.au)

Dear Minister Scanlon,

**RE: Intense Residential Development/Mixed Use and Wave Pool proposal for Coolum West on the Sunshine Coast**

The Sunshine Coast Association of Residents (OSCAR) is the peak Residents Group on the Sunshine Coast.

OSCAR, along with 5 other Sunshine Coast Community Groups (listed below), previously wrote to your predecessor, Leeanne Enoch MP when Minister for Environment and Science regarding an inappropriate, unsustainable and very controversial proposal to develop the vital Maroochy River flood plains at Coolum West.

Following the declaration of the State Election we wrote (Dec 3 2020) to the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning outlining our concerns and requesting an urgent meeting with him to share our concerns re the request for a PDA for this proposal..

The purpose of this letter is to respectfully request a meeting with you in order to introduce our Group Representatives, to reiterate our concerns in relation to the proposal by Consolidated Properties and to advise you of the current position of our Change.org petition, currently carrying 2,150 signatures and several hundred comments.

We also take this opportunity to attach our submission previously delivered to former Ministers: then MP Kate Jones, Leeanne Enoch MP, Cameron Dick MP in June/July 2020, updated as at December 1 2020, following the release of the Sunshine Coast Draft Coastal Hazard Adaptation Strategy and sent to the Deputy Premier with the December 3 letter and Minister Hinchliffe MP and yourself today.

We look forward to hearing from you in the near future.

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
- Sunshine Coast Environment Council (SCEC) – Ms Narelle McCarthy
- Organisation of Sunshine Coast Association of Residents (OSCAR) – Ms Melva Hobson





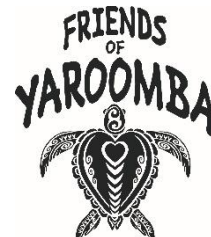
## **OPPOSITION to proposed intense residential/mixed use development and wave pool at Coolum West on the Maroochy River Floodplain**

Revised submission as at December 1 2020 to take into account new Ministerial Portfolios post the 2020 State Election and work undertaken by Sunshine Coast Regional Council as part of the Coastal Hazard Adaptation Strategy (CHAS)

### **Submission**

**Minister for State Development, Local Government and Planning**

**Dr. Steven Miles, Deputy Premier**



## **OPPOSITION to a proposed intense residential development and wave pool at Coolum West on the Maroochy River Floodplain**

### **Executive Summary**

As the Community 6 we represent some 15000+ residents across the broader Sunshine Coast and Noosa regions.

In 2004 Consolidated Properties submitted a proposal for preliminary approval of a master planned residential development on the Maroochy River Floodplain and Catchment at Coolum West. This rightly was not supported by both council and the state.

Consolidated Properties again has a proposal for the same (but expanded) Maroochy River Floodplain and Catchment at Coolum West. Whilst at this stage the proposal is only in the form of a draft plan, it suggests approximately 63 percent of the overall footprint will be residential, 13 percent a hotel, apartments, retail school and light industry with only 15 percent for community sports.

The Community 6 has many grave concerns with this proposal.

The developer has made it very clear that both the residential development (1500 lots) and mixed-use activities, including the 'wave pool' are inextricably linked. This strongly suggests the project is unviable and unsustainable.

The subject land is zoned 'Rural' in the Sunshine Coast Planning Scheme 2014 (SCPS 2014) and is outside the Urban Footprint in the 2017 South East Queensland Regional Plan (SEQRP/Shaping SEQ). The Treasurer and previous Minister for Planning and Infrastructure confirmed that the proposed shopping centre and residential development is prohibited development under the SEQRP.

There are many planning issues associated with the subject land, including, but not limited to, acid sulphate soils; agricultural land declaration; KRA 156 for sand; erosion prone areas; high storm tide inundation area; areas of high ecological significance; and flood hazard area under the SCPS 2014 (the entire site is subject Current Climate Riverine Flooding).

Perhaps even more concerning is that the site is in the area designated by the Sunshine Coast Regional Council (SCRC), in partnership with the State Government and Unity Water, as the "Blue Heart" – Blue Carbon initiative. This is a worthy initiative that should be progressed to its maximum extent (5000ha) for the multiple benefits it would provide.

Not only is the Blue Heart area significant in itself, but with the floodplain as a whole, it plays an integral and critical role in ensuring the safety, health and wellbeing of people in the area both now and into the future. The Draft Coastal Hazard Adaptation Strategy (CHAS), developed by Council and currently out for public comment, acknowledges the value of the Blue Heart in terms of ecosystem services and offers a favourable, yet conservative estimate of current and potential value of ecosystem services supplied by this area compared with current and future agricultural production.

The value of the much touted "wave pool" to the local community is strongly disputed by many within the surfing community. There are concerns that access to the wave pool by members of the community will be prohibitively expensive and only open a few days a year to the general public. The developer has been particularly obtuse in relation to pricing and accessibility.

An examination of information available to the general community via the official Wave Pool website is most disappointing. The FAQs section of the website promotes the wave pool without any reference to numbers and detail of the residential component. Reference to any constraints are glib, do not answer the questions asked and do not convey the full story. It is purely marketing hype.

The FAQs section can be found at:

<https://www.surfranchsunshinecoast.com.au/faqs/>

Further, the web page references an indigenous cultural centre but has not given any outcomes from discussions with the Gubbi Gubbi First Nations People. It is our understanding that there has been one consultation.

The FAQs section also makes reference to the SCRC as if the council is supportive. They are not.

It is particularly important, given the flood data available and the challenges of climate change that we do not further compromise the flood storage capacity of the Maroochy River Floodplain. The Maroochy River Floodplain must be protected and preserved. The future for residents living in the area but particularly downstream of the Maroochy River, will be dependent on a viable flood storage and conveyance system and an area where tidal inundation will be permanent.

No proposal for any further residential development on the Maroochy River Floodplain should be considered.

## Introduction

We the Community 6 represent a number of resident, environment and community groups, both local and peak body, across the Sunshine Coast region. These groups and their Presidents/representatives include:

- Coolum Residents' Association (CRA) - Mr Ray Barber
- Surfrider Foundation – Mr Steve James
- Development Watch - Ms Lyn 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

Membership of these organisations represents some 15000+ residents across the broader Sunshine Coast and Noosa regions.

The proposed development by Consolidated Properties Group on flood-prone rural-zoned land at Coolum West comprising intense residential development and mixed-use activity with a 'wave pool', is of grave concern to residents of Coolum and surrounding localities on the Sunshine Coast.

The Community 6 made submissions from June 2020 until the State Election in October 2020 to: the Premier, the previous Minister for State Development, Tourism and Innovation, Kate Jones, then MP. Similarly the submission was sent to the then Minister for Natural Resources, Dr Anthony Lynham, the previous Minister for Environment and Science Leeanne Enoch MP and the then Treasurer and Minister for Planning, Cameron Dick MP. Copies were also sent to all heads of department in the then Department of State Development, Tourism and innovation.

The submission has been updated to include relevant information from the recently released Sunshine Coast Regional Council Draft Coastal Hazard Adaptation Strategy (CHAS).

## The Proposal

**The 510 ha 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 (SEQRP/Shaping SEQ).**

In terms of development, the draft development plan suggests around 12 hectares for the wave pool, 83 hectares of residential development, with another 17 hectares for hotel and apartments associated with the wave pool, retail, light industry, and school; and another 20 hectares for community sports.

The developer has made it very clear that both the residential development (1500 lots) and mixed-use activities, including the 'wave pool' are inextricably linked. This strongly suggests the project is unviable and unsustainable.

The developer has also indicated on several occasions that a decision from the Government on declaration of a PDA is imminent. However, it appears that the developer has changed his approach to one now of a veiled threat to the Government that the World Surf League will withdraw the project and take it elsewhere if approval is not forthcoming. Given the nexus between the proposal and its dependence on the residential component in this location, and that we understand that a suggested different location on the Sunshine Coast was refused, such a statement should be seen for what it is – a threat to attempt to keep an unsustainable development alive.

### **Background/History**

In 2004 Consolidated Properties lodged an Application for Preliminary Approval for a residential master-planned community, namely Coolum Lakes, on a 387 hectare flood plain at Coolum West, then owned by Jay Chandler. Council and the State Government did not support the development and it rightly did not proceed. Despite this, Consolidated Property Group continued speculatively to buy up parcels in the floodplain to now have a 510 ha holding ('the site').

Questionable representations made by the developer to have his holding included in the Urban Footprint in ShapingSEQ were appropriately not supported. In mid-2017, Consolidated Properties subsequently announced its intention to progress an application to operate a sand mine under the Key Resource Area designation over a large portion of the site. This did not proceed.

Consolidated Properties objective is still to turn the site into an extensive residential/commercial development with the 'wave pool' component simply marketed as the 'Trojan horse' for urban development.

### ***The site for the proposal – Planning and State Interests***

#### ***Key planning issues with the proposal***

- 1 Existing Rural Zoning under the Sunshine Coast Planning Scheme 2014 (a consistent zoning carried through from earlier local planning instruments)
- 2 Regional Landscape and Rural Protection Area designation under the SEQ Regional Plan.
- 3 Multiple State Planning Policy matters:
  - a. Acid Sulfate Soils (ASS) over the entire site.
  - b. Important Agricultural Area and Agricultural Land Class A and B
  - c. Key Resource Area for sand (KRA156), plus separation area and transport route, covering a significant portion of the site.
  - d. Erosion Prone Area.
  - e. High Storm Tide Inundation Area.
  - f. Some areas of High Ecological Significance Wetlands and Regulated Vegetation (Essential Habitat).
- 4 Flood Hazard Area under the planning scheme (the entire site is subject Current Climate Riverine Flooding).
- 5 The most limiting factor is compliance with the Flood Hazard Overlay Code. The Overall Outcomes of the Flood Hazard Overlay Code are:
  - a. *development does not occur on land subject to flooding except in specified circumstances and only where the impacts of flooding can be effectively ameliorated such that there is no foreseeable risk to life or property;*
  - b. *development protects floodplains and the flood conveyance capacity of waterways;*
  - c. *development in areas at risk from flood and storm tide inundation is compatible with the nature of the defined flood or storm tide event;*
  - d. *the safety of people is protected and the risk of harm to property and the natural environment from flood and storm tide inundation is minimised; and*
  - e. *development does not result in a material increase in the extent or severity of flood or storm tide inundation.*

The Defined Flood Event (DFE) in this area is around 3.0 m AHD. Floor levels for most development have to be 0.5 m above the DFE. Given almost all of the development site is below 1.0m AHD, this will require around 2.5 m of fill for building sites, and around 2.0 m of fill for access roads. A 'back of the envelope' calculation suggests over 2 million cubic metres of fill would be required. This amount of fill will obviously affect the flood storage capacity of this catchment. Presumably, the fill would come from on-site (the KRA suggests a significant sand deposit), but this then raises the Acid Sulphate Soil (ASS) contaminant release issue.

Given the obvious intention and necessity to "fill" extensive areas in an attempt to 'create' developable areas, the recognized planning requirement of "no worsening of flood risk" is extremely relevant and problematic for this and any other development proposed on the floodplain. Associated with this is the "right to fill" of existing residential property owners within the catchment. The Maroochy River floodplain has already been extensively and inappropriately 'filled' leaving limited capacity within this dynamic catchment for flood storage and conveyance.

It will be difficult to achieve the Performance Outcome (PO1) for Floodplain Protection under the Flood Hazard Overlay Code:

There is no acceptable outcome identified for this performance outcome

*Development is undertaken in a manner that ensures:-*

- (a) *natural hydrological systems are protected;*
- (b) *natural landforms and drainage lines are maintained to protect the hydraulic performance of waterways; and*
- (c) *development integrates with the natural landform of the floodplain rather than modifying the landform to suit the development.*

In a recent answer to a resident inquiry to the Premier and referred to the then Treasurer and Minister for Planning and Infrastructure for a response, the following was received:

*I understand your concerns relate to a proposal by the World Surf League and Consolidated Properties Group (the consortium) to develop a range of uses for the land west of Coolum, including a surf wave facility; community and sports facilities; hotel and resort facilities, a shopping centre, school and a residential subdivision. I acknowledge your specific concerns relating to the flooding of the subject land.*

*The location of the current proposal is outside the Urban Footprint under the South East Queensland Regional Plan 2017 (ShapingSEQ). Under the relevant provisions of the Planning Regulation 2017, **the proposed shopping centre and residential subdivision are prohibited development.** (Our emphasis) This means a development application cannot be submitted under the Planning Act 2016 (the Planning Act) for these aspects of the proposal. Given the surf wave facility and other tourism components are not prohibited, a development application could be submitted under the Planning Act for those land uses. The Sunshine Coast Regional Council (the council) would be the assessment manager if a development application was submitted for a surf wave facility and other tourism components. However, there is a range of planning, infrastructure and environmental constraints associated with the site, including flooding, that would need to be assessed by the council.*

*I can advise that a formal development application under the Planning Act has not been submitted to the council as the assessment manager or to the State Assessment and Referral Agency (SARA) as a referral agency. I can confirm SARA becomes involved in a development application if it affects a matter of state interest, such as state transport infrastructure or clearing native vegetation.*

*I am advised that the consortium has approached the Department of State Development, Tourism and Innovation to consider a **Priority Development Area (PDA) declaration for the subject lands.** (Our emphasis). PDAs are considered and declared by the Minister for State Development, Tourism and Innovation in accordance with the Economic Development Act 2012 (ED Act). If a PDA was declared it may be possible for the proposal to be considered for development approval under the ED Act. **The assessment of a PDA declaration must have consideration of a range of matters including ShapingSEQ.** I am advised that no decision has been made regarding the PDA declaration request (our emphasis).*

### **State Interests associated with this development proposal**

State Interest Policy 4 provides:

*“Development in bushfire, flood, landslide, storm tide inundation or erosion prone natural hazard areas:*

- (a) *avoids the natural hazard area; or*
- (b) *where it is not possible to avoid the natural hazard area, development mitigates the risks to people and property to an acceptable or tolerable level.”*

and includes the advice that:

*“Planning schemes should acknowledge the risks identified through the flood risk assessment process. They should present a clear strategic settlement pattern that supports the achievement of broader flood risk management objectives for the LGA. ... This may involve avoiding new urban development in flood-prone areas of intolerable risk, or excising higher risk areas from the urban footprint.”*

Council and the State have in fact properly integrated the State Interests by zoning this land Rural and excluding it from the Urban Footprint and outside the Urban Growth Management Boundary. Any flood risk assessment could only conclude that the risk for this site is “intolerable” as defined in the Policy. The public interest is not met by exposing the community to an “intolerable” flood risk.



## Images taken over the past 25 years of the flooding on the land west of South Coolum Road



The site sits entirely within the Maroochy River floodplain and experiences flooding to significant depths (see photos above) and tidal inundation. Furthermore, it is understood that the storage capacity of the Maroochy River lower estuary floodplain has already been exceeded by the 'priority fill' rights of current lots in the Twin Waters, Marcoola, Pacific Paradise and Mudjimba localities.

No doubt the Government has not forgotten the devastating Townsville floods of 2019 through newly created urban areas that had been built to Q100 levels. State Planning Policy Natural Hazards, Risk and Resilience – Flood is quite clear that “Flooding is Queensland’s most damaging natural hazard and is second only to tropical cyclones in terms of fatalities.” (Page 1).

### ***Sunshine Coast Regional Council (SCRC) Response – The Blue Heart***

The site is in the area designated by the SCRC, in partnership with the State Government and Unity Water, as the “Blue Heart” – Blue Carbon initiative<sup>1</sup>. This is a worthy initiative that should be progressed to its maximum extent (5000 ha) for the multiple benefits it would provide. These benefits include:

1. The Blue Heart will strengthen the Maroochy-Noosa Wallum Corridor.
2. The area has high biodiversity values as recognised at a state and national level.
3. Regional climate resilience
4. Catchment-wide flood mitigation, storage and conveyance
5. Ecological restoration and enhancement
6. Economic and environmental benefits derived from carbon sequestration and ecosystem services

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



7. Nature-based (low impact) ecotourism and cultural tourism opportunities
8. Significant and enduring regional community and social benefits such as parklands, sports fields and open space
9. Scenic and visual amenity.

A project such as that currently proposed by Consolidated Properties would irrevocably undermine and negatively impact on the considerable merits and long-term, sustainable public interest benefits of the Blue Heart.

In 2019 the State Government through Minister Enoch (DES) issued a Media Release titled “**Blue carbon partnership an Australian first**”, relating to the Blue Heart and described its significance as:

*Wetlands along the Maroochy River on the Sunshine Coast are set to become a world leading showcase for environmental innovation, after the Palaszczuk Government has formed an Australian-first partnership with Sunshine Coast Council and Unitywater.*

*The ‘blue carbon’ project focuses on the natural floodplain in the river catchment, an area known as the Blue Heart, and will help protect local infrastructure from flooding.....*

*This blue carbon project will focus on the more than 5000 hectares of natural floodplain in the Maroochy River Catchment, and will demonstrate how land can be managed to improve water quality, biodiversity and carbon sequestration, while providing more places for recreation.*

*“Blue carbon is a potential new carbon-farming method where Queensland has an advantage,” Minister Enoch said.*

#### **The full Media Release can be seen in Appendix 1**

What a travesty it would be if the State government turned around now and jeopardised such an innovative project in which it has an interest, for the sake of a developer’s aspirations and a facility for the elite.

#### **What the developer has NOT told the community about this proposal and its impact on the floodplain**

The developer has indicated that water for the wave pool will be extracted from the Maroochy River. There are many questions and issues around such a proposal:

- How will such extraction impact on the ecology of the river, both macro and micro biodiversity?
- At what rate would water be extracted?
- If there is an intent to replenish the water in the wave pool, with what frequency and what impacts on the river ecology and balance?
- What would be the implications for mineral mobilisation with acid sulphate and humic soils?
- The Maroochy River is a declared Fish Habitat area – what impacts might a potential change in the salt/freshwater and pH balance have?
- The recreational fishing values of the river are currently in decline, and this will only add to the impact on the highly lucrative tourism industry.

#### **The ecological significance of the Maroochy floodplain**

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.

The role and vulnerability of the Maroochy River catchment and floodplain have 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.

#### **SCRC’s response to the proposal**

Representatives from the above community groups met with the SCRC A/CEO and Senior Strategy Officer and the Councillor for Division 9 (within whose division this proposal is sited) on Monday, 20 July 2020. SCRC reiterated their opposition to the Consolidated Properties proposal. They also indicated that the Mayor, the A/CEO and other officers have made their concerns known to the government on a number of occasions.

We now have been reliably informed that SCRC has written to Ministers in the new State Government to advise them of Council's unequivocal objection to this development proposal.

No proposal for any further residential development on the Maroochy Floodplain should be considered. It is particularly important, given the flood data available and the challenges of climate change, that we do not further compromise the flood storage capacity of the Maroochy Floodplain.

## Managing for climate change – SCRC draft CHAS

On 9 November SCRC unanimously supported the release of the Draft Coastal Hazard Adaptation Strategy for community consultation. The CHAS has 6 Purposes of which 4 can be related specifically to the site in question on the Maroochy floodplain. They are (*SCRC Draft Coastal Hazard Adaptation Strategy p4*):

- **Identify coastal hazards, including erosions, storm tide and tidal inundation**
- *Inform decision making regarding the protection and management of our coast and foreshore*
- **Inform future landuse planning**
- *Guide the management and/or location of public utilities and facilities*
- **Guide the management of areas of environmental and cultural significance**
- **Foster collaboration and the shared care of our coastal zone/estuarine areas.**

Those highlighted are particularly important when it comes to dealing with floodplains and estuarine areas.

Reference is made to the *Coastal hazard technical guide (DEHP 2013)*, where it states:

- *Sea level rise will increase the apparent severity and frequency of storm tide inundation and will cause inundation to occur further inland*
- *Increased cyclone and storm intensity will add to the magnitude of storm tide events and the extent of inundation.*

The Strategy has divided the coastal area into Beach Units within a CHAS zone. CHAS Zone 1 (Coolum Beach to Maroochy estuary), identifies in the proposed **Adaptation response pathway** for beach unit 7 (Maroochy Estuary and floodplain), that from 2041 both mitigation and transition will be required in this area. (*Draft CHAS p26*)

The maps of Erosion Prone Areas and Storm Tide Inundation for the present, 2041, 2070 and 2100 as shown in the *CHAS Supplement B* and included in this submission as (Appendix 3) clearly show the critical role of the Maroochy floodplain both now and into the future.

Detail provided on page 51 of the Draft CHAS relating to the Maroochy estuary and floodplain states:

*Both developed and undeveloped areas of the estuary and floodplain are likely to be increasingly exposed to tidal and storm tide inundation and coincident flooding in the future. Low lying urban areas may be at risk from long term inundation hazards.*

*The present-day adaptation for the Maroochy Estuary and floodplain is to mitigate coastal hazard risk and to prepare and begin a transition process for land use in specific areas.*

*The adaptation pathway includes a focus on maintaining the natural north shore for the estuary, upgrading existing revetments and groynes on the south shore, resilient housing, reviewing planning controls, drainage upgrade, and transition planning and implementation (Chambers Island, Blue Heart.)*

So significant is the Maroochy floodplain that in the *CHAS, p 30*, the case study example provided for *mitigation/transition* is that of the Blue Heart. The case study compares the value of current and future agricultural land use with the estimated value of transitioning to a wetland ecosystem and supported as follows:

*The estimated value of current agricultural land use is around \$2 million per year (lower end estimate). The estimated value of transitioning to a wetland ecosystem is around \$12 million per year. (CHAS Table 12, p30). The value of*

wetland ecosystem services created by the Blue Heart expansion well exceed the value of any agriculture lost and strongly supports the current transition initiatives. (CHAS p 30). The full case study is included as appendix 4.

Based on this information alone, to consider allowing an intense residential/mixed use and wave pool to be constructed on the Maroochy floodplain is in direct opposition to the reasons why the State Government in conjunction with LGAQ, has funded the development of the Coastal Hazard Adaptation Strategies by coastal local governments under the QCoast 2100.

### ***Community information and engagement re the proposal***

#### ***Misleading-community access to the proposed facility***

When the community groups associated with this submission met with Mr Don O'Rorke (Consolidated Properties) and Mr Andrew Stark (World Surf League), they were questioned regarding the accessibility of the facility to the general surfing community. Their response indicated that this was not a facility for the casual surfer or a surfing family to "have a surf" on the way home from work or on the weekend.

They were also asked about cost and would not give any information in relation to its affordability again for the casual surfer or surfing family. We have heard of costs in the range of \$100's of dollars for one wave attempt and thousands of dollars for daily hire.

When asked about the capacity of the Sunshine Coast Motorway to accommodate the amount of traffic this facility might generate, the response from the developer was that that is a state responsibility!

#### ***Consultation with the Gubbi Gubbi First Nations People***

We understand that the developer has had one meeting with the Gubbi Gubbi Traditional Owners. The Maroochy River and floodplain area are key Gubbi Gubbi environments. As community groups, we would want to ensure that the State and the proponent have had conversations with the Gubbi Gubbi people and that the Gubbi Gubbi First Nations people have felt that they have been fully engaged in consideration of this proposal.

#### ***Information available to the Community from the proponent***

The webpage Surfranch Sunshine Coast is obviously a marketing tool for the proponents. However in relation to some of the key issues, particularly in the Frequently Answered Questions (FAQ's) the information is either non-existent, obtuse or misleading. This particularly relates to questions related to flooding, residential development, urban footprint and environmental issues.

For example:

- Mr Don O'Rorke when asked at our meeting, with he and Mr Andrew Stark, to justify the claim of 10,000 jobs over the life of the project, Mr O'Rorke indicated that there is a formula where the project spend multiplied by a factor gives the number of jobs. This model has been found to be totally flawed in relation to other projects. Any construction jobs created are short term, where transition to a wetland environment would see longterm jobs created.
- The FAQ relating to flooding and Acid Sulphate Soils almost dismisses them by making a statement re mitigation of flood impacts but with no detail.
- One FAQ asks whether the proposal is outside the urban footprint - there is no reference at all to being outside the Urban Footprint under the SEQ Regional Plan 2017 (*Shaping SEQ*).
- In terms of commercial drivers they say" the surf facility must be underpinned by broader commercial drivers such as an eco-lodge, training facilities, residential and tourist accommodation." Such a statement does not give the full extent of the other elements of the proposal.
- At no point do they say that the proposed shopping centre and residential subdivision are prohibited development under the relevant provisions of the Planning Regulation 2017.

#### **KPMG survey of 500 people on behalf of the developers.**

The community 6 respectfully suggests that the State Government interrogate thoroughly the KPMG survey conducted on behalf of the developers as it was designed in such a way that if one answered in opposition to the proposal there were no further opportunities for comment. At the point in time when the KPMG survey was conducted there was almost NO information in the community about the real intent of the proposal – intense residential/mixed use development with a "wave pool" as a carrot to the State to overcome the Statutory Planning constraints.

## **Community 6 Change.org. Petition**

Given the claims made by both the developer and World Surf League representative, Mr Andrew Stark, about their consultation and the alleged support for the project, the Community 6 established a petition at Change.org:

<https://www.oscar.org.au/stop-coolum-west/>

Currently there are approximately 2150 signatures of community members asking the government to refuse the proposal at Coolum West. On completion of the petition those signatures and the comments will be forwarded to State Government Ministers and Department CEO's. From the comments so far there are only 1 or 2 supporters of the project.

### ***Conclusion - Community Health and Well-Being***

We note that as a result of Covid19, all levels of Government have made it clear that the health and well-being of communities is a priority for government.

The State Government's recent legislation the "Human Rights Act 2019" provides that Queenslanders have a right to a safe and healthy future and should be able to make genuine choices about their lives. The likelihood of catastrophic events as a result of climate change will create flooding risks and traumatic situations that would not be in the interests of the safety, health and well-being of the community.

At the meeting with the developer and Mr Stark, Mr O'Rorke commented "that people wanted to live north of the Maroochy River and this residential development would achieve that." Frankly, this is not their "call". There are legislated processes that involve genuine community consultation, not confected consultation that targets only a certain component of the community. The development ambitions of this developer (or any other developer for that matter) is not the means by which planning for ecological sustainability for South East Queensland should be undertaken. The whole Planning Process under the Planning Act 2016 and the principles underpinning that Act define how planning is undertaken.

It should be noted that we have no objection to a 'wave pool' per se in the region. However, this is not the right location. We remind the community, the developer and the State that the site proposed for this development is currently zoned rural and is outside both the SCPS Urban Growth Management Boundary and the South East Queensland Regional Plan Urban Footprint Boundary. Furthermore, a large portion of the subject site is mapped as a State Key Resource Area for extractive industries designed to buffer such interests from incompatible land use, particularly residential development. The entire site is also mapped as a flooding and inundation area on the Flood Hazard Overlay.

Additionally, the argument that a 'wave pool' and urban development of up to 1500 Lots are inextricably linked doesn't stack up. There appear to have been other major tourist/entertainment precincts in south-east Queensland, such as Australia Zoo, Dreamworld and Seaworld etc, developed as successful stand-alone enterprises.

We appreciate the difficulties the construction industry is facing owing to the COVID-19 shutdown and are supportive of appropriately approved developments being actioned BUT COVID-19 SHOULD NOT be used as an excuse to allow the development of floodplains which could result in further trauma and unnecessary risk for communities in the future. These areas are already vulnerable. There is plenty of opportunity for activity in the Maroochydore CBD and we would encourage construction companies to explore those opportunities.

No proposal for any further residential development on the Maroochy Floodplain should be considered. It is particularly important, given the flood data available and the challenges of climate change that we do not further compromise the flood storage capacity of the Maroochy Floodplain.

Let the floodplains do what they are intended to do and protect our downstream communities by storing floodwaters. The floodplains must be protected and preserved.

## Appendix 1

### Blue carbon partnership an Australian first

Published Wednesday, 24 July, 2019 at 09:56 AM

#### Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts

The Honourable Leeanne Enoch

Wetlands along the Maroochy River on the Sunshine Coast are set to become a world leading showcase for environmental innovation, after the Palaszczuk Government has formed an Australian-first partnership with Sunshine Coast Council and Unitywater.

The 'blue carbon' project focuses on the natural floodplain in the river catchment, an area known as the Blue Heart, and will help protect local infrastructure from flooding.

Announcing the historical partnership today, Minister for Environment and the Great Barrier Reef Leeanne Enoch said blue carbon – the carbon stored in the plants and soils of wetlands and coastal areas – is a priority for the Palaszczuk Government's \$500 million Land Restoration Fund.

"That is why today I am also pleased to announce more than \$4 million for a number of projects in the next round of funding, known as the Catalysing Action Grants, under our flagship \$500 million Land Restoration Fund," Minister Enoch said.

"The Land Restoration Fund is a key plank of the Palaszczuk Government's commitment to take action on climate change and meet our target of zero net emissions by 2050, and today's partnership is helping us achieve this goal."

This blue carbon project will focus on the more than 5000 hectares of natural floodplain in the Maroochy River Catchment, and will demonstrate how land can be managed to improve water quality, biodiversity and carbon sequestration, while providing more places for recreation.

"Blue carbon is a potential new carbon-farming method where Queensland has an advantage," Minister Enoch said.

"We know there are job and economic opportunities in carbon farming; research has shown that Queensland's emerging carbon farming industry could contribute up to \$8 billion to the economy by 2030, helping to generate new jobs, revenue streams and market opportunities, especially for regional, rural and First Nations communities."

Sunshine Coast Mayor Mark Jamieson said outcomes of the partnership would further strengthen the adaptation and resilience of the Sunshine Coast.

"Through the Blue Heart we're continuing to demonstrate our commitment to sustainability and enhancing our natural assets," Mayor Jamieson said.

"In particular, this initiative is another tangible demonstration of how our Sunshine Coast Council is working with its partners to strengthen our region's climate resilience and taking real action to assist our communities adapt to a changing climate.

"The Blue Heart will support landholders and local communities to adopt new land management practices that build future economic and environmental resilience, while retaining a focus on flood hazard management.

"It will not affect the existing land use entitlements of current private landowners, but through a coordinated and supported approach, will enable them to explore new land management options for the use of their properties.

"The Sunshine Coast, and our Blue Heart area, is the ideal location to investigate blue carbon opportunities.

"Importantly, it is an opportunity to work with representatives of the Kabi Kabi First Nations peoples to examine new opportunities for the future, which celebrate and respect their heritage and recognise the cultural significance of the Maroochy River catchment to their community."

Unitywater's Yandina Creek Wetland, in the vicinity of the Blue Heart, is a 'green engineering' solution and a lower-cost alternative to sewage treatment plant upgrades.

Unitywater Chairman Jim Soorley said the wetland used the natural environment to remove sediments and nutrients from the Maroochy River.

"The Blue Heart has great environmental potential and will significantly boost what our wetland is already doing, to improve water quality," Mr Soorley said.

"By contributing to this project, Unitywater will be able to take advantage of these natural processes to offset the cost of our sewage treatment processes and keep our customers' bills as low as possible.

"The Yandina Creek Wetland will remove about 5.3 tonnes of nitrogen and 0.5 tonnes of phosphorous each year from the Maroochy River. The Blue Heart has potential to substantially increase this amount and will contribute to offsetting the impact of future population growth in our region."

Minister Enoch said there are many ways in which carbon farming activities can deliver a reduction in greenhouse gas emissions and create significant social, cultural and environmental benefits.

"More than \$4 million has been allocated to six successful projects throughout the state in this round of the program," Ms Enoch said.

"These grants provide funding to on-the-ground carbon farming projects that will have environmental, social and economic benefits."

Successful projects include Bush Heritage Australia, which is receiving \$735,000 to assess a new way to farm carbon in the Rangelands and Brigalow Belt, and the Yambangka Aboriginal Cultural Heritage and Tourism Development Aboriginal Corporation who are receiving \$742,000 to implement a rotational grazing program and cease the clearing of regrowth to allow the traditional forest to regenerate and absorb carbon.



## Appendix 2

SCRC Media release November 2, 2020

### Blue Heart Sunshine Coast receives national recognition

One of Sunshine Coast Council's region-shaping projects – Blue Heart Sunshine Coast – has been awarded the Regional Innovation Project of the Year at the Cities Power Partnership (CPP) Climate Awards.

The innovation award seeks to uncover and celebrate transformative climate solutions and inspire other councils and levels of government to proactively manage the impacts of a changing climate.

Blue Heart Sunshine Coast is an area of more than 5,000 hectares within the Maroochy River floodplain.

The area is impacted by tidal inundation and, over time, is expected to continue transitioning from predominantly rural lands to estuarine wetlands due to climate change and projected sea level rise.

The Blue Heart project seeks to manage the land and water through this transition in a sustainable manner to provide opportunities for our environment, community and economy.

Sunshine Coast Council Mayor Mark Jamieson said the Blue Heart Sunshine Coast project was an innovative approach to secure opportunities for the future, consistent with council's objectives in its [Environment and Liveability Strategy](#).

*"The Blue Heart project is just one of the fantastic examples of how our council works with its partners – which in this case, is the Department of Environment and Science and Unitywater – to take action to identify risks and help our community prepare for the impacts of a changing climate,"* Mayor Jamieson said.

*"Blue Heart Sunshine Coast is an Australian-first project and one which seeks to provide environmental, social and economic co-benefits within the Maroochy River floodplain's transitioning landscape.*

*"The Sunshine Coast, and our Blue Heart area in particular, is the ideal location to investigate carbon farming and blue carbon opportunities.*

*"The Blue Heart will support private landholders and the local community to adopt new land management practices that build future economic and environmental resilience, like blue carbon, while contributing to council's net-zero emission target.*

*"Our Blue Heart partnership is a long-term commitment and one that will continue to grow and build momentum at a regional, national and international scale."*

Division 9 and Environment and Liveability Portfolio Councillor Maria Suarez said Blue Heart Sunshine Coast was a ground-breaking project and the national recognition through the CPP's Regional Innovation Award was well deserved.

*"I'm so proud of what we've already been able to achieve through the Blue Heart project,"* Cr Suarez said.

*"We've bought more land and dedicated it to conservation, rehabilitated waterways, facilitated a Blue Carbon research forum to investigate economic opportunities for private landholders and created community spaces like Unitywater's Yandina Creek Wetland.*

*"And, this is only the beginning.*

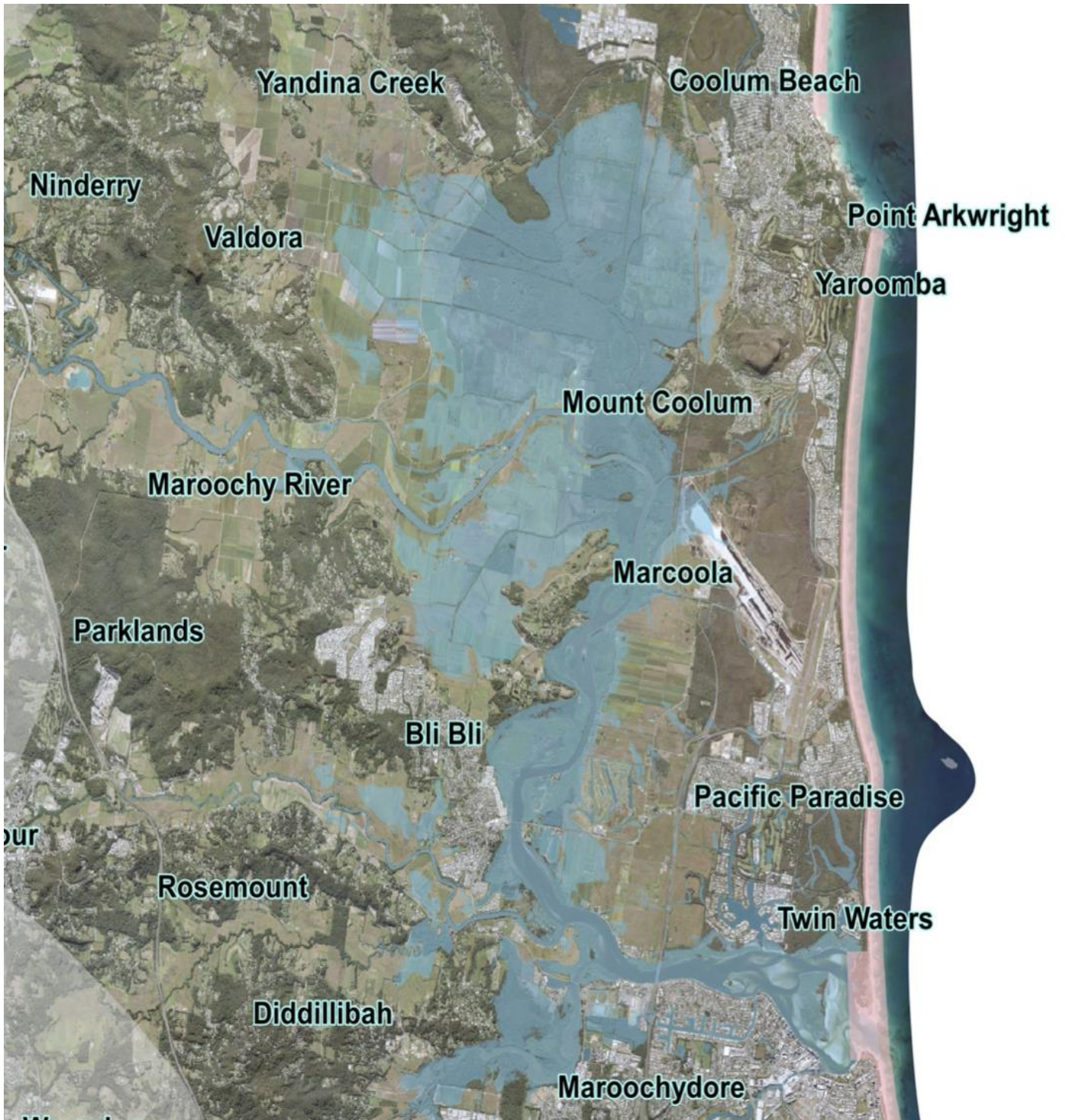
*"Blue Heart Sunshine Coast is one of council's five major green spaces that will contribute to the liveability and identity of our region and reinforce our vision to be Australia's most sustainable region – healthy, smart, creative."*

**EXTRACTS FROM CHAS MAPS**

**Erosion Prone Areas - Present day**

- 1% AEP open coast erosion\*
- Tidal areas - HAT\*\*

AEP = Annual Exceedance Probability  
HAT = Highest Astronomical Tide

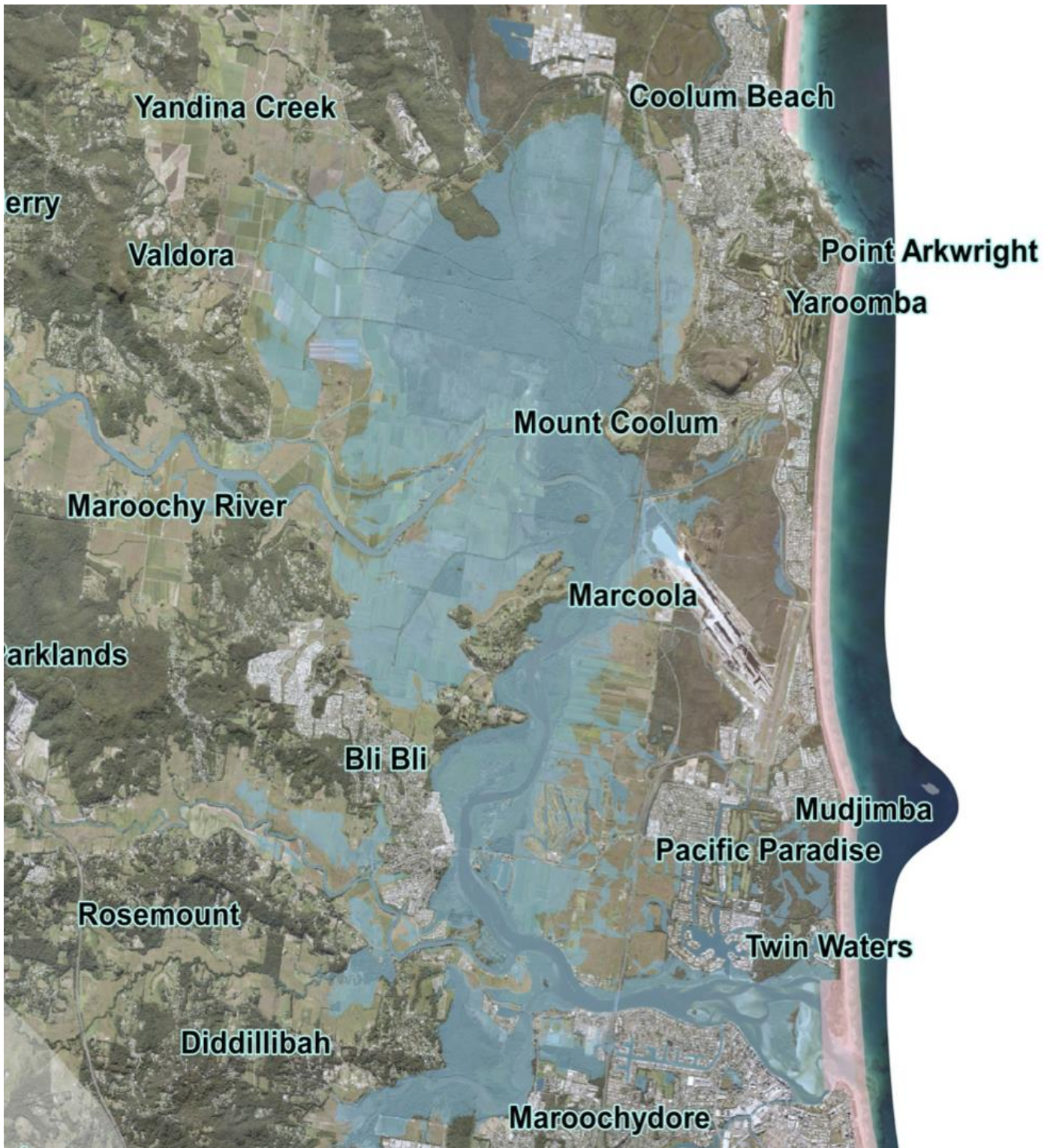




# Erosion Prone Areas - 2041

- 1% AEP open coast erosion\*
- Tidal areas - HAT\*\*

AEP = Annual Exceedance Probability  
HAT = Highest Astronomical Tide

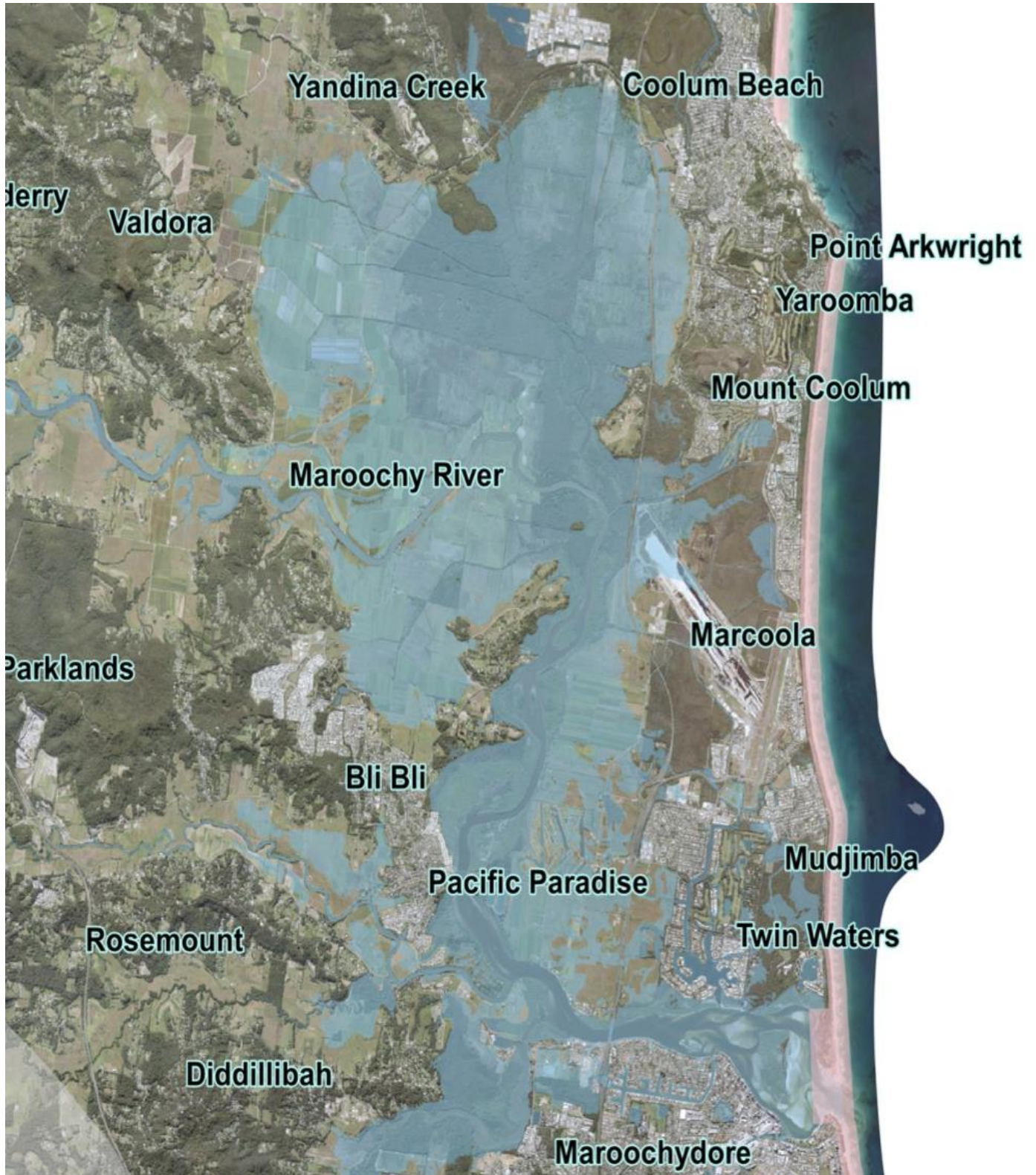




# Erosion Prone Areas - 2070

- 1% AEP open coast erosion\*
- Tidal areas - HAT\*\*

AEP = Annual Exceedance Probability  
HAT = Highest Astronomical Tide

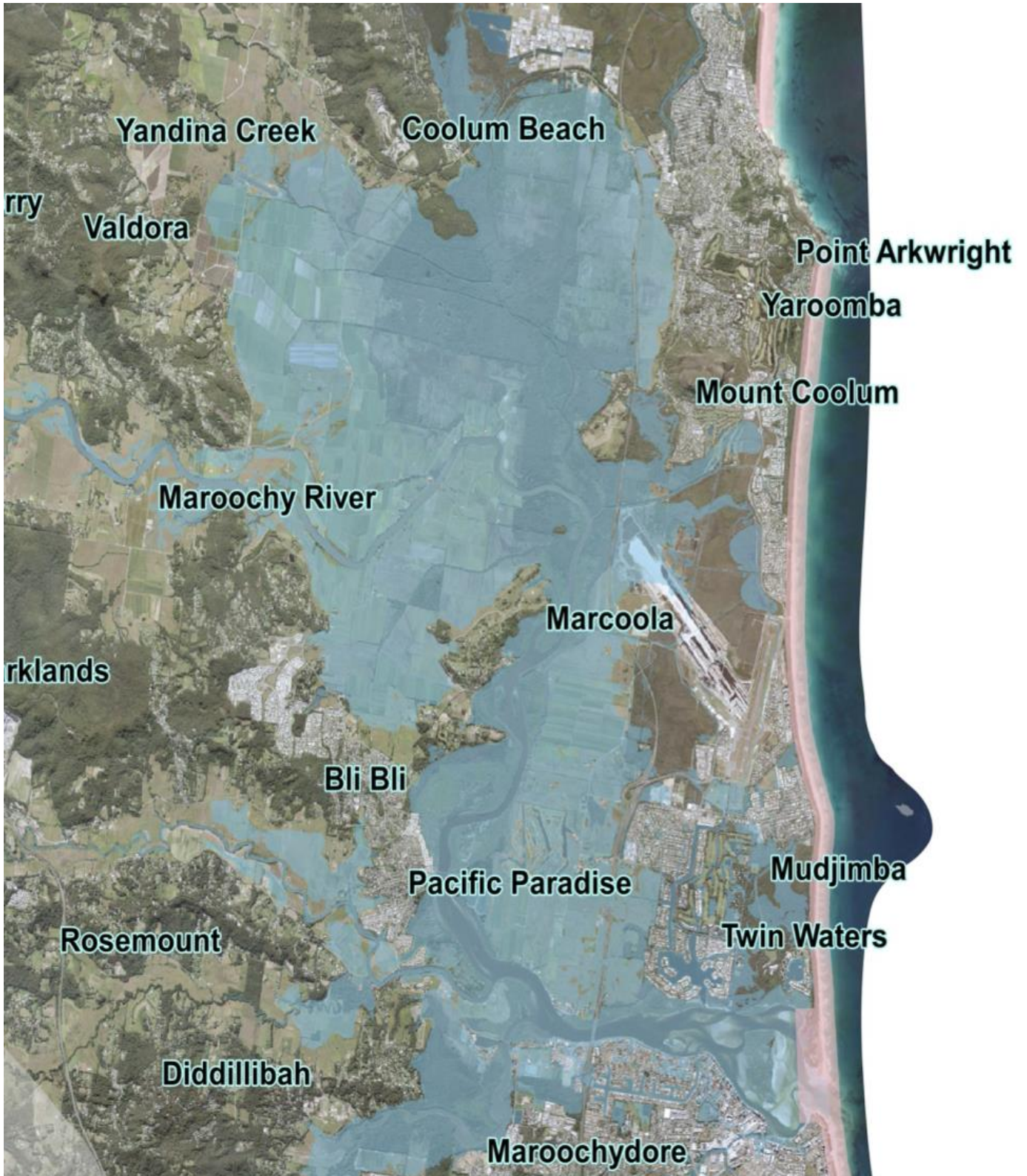




# Erosion Prone Areas - 2100

- 1% AEP open coast erosion\*
- Tidal areas - HAT\*\*

AEP = Annual Exceedance Probability  
HAT = Highest Astronomical Tide

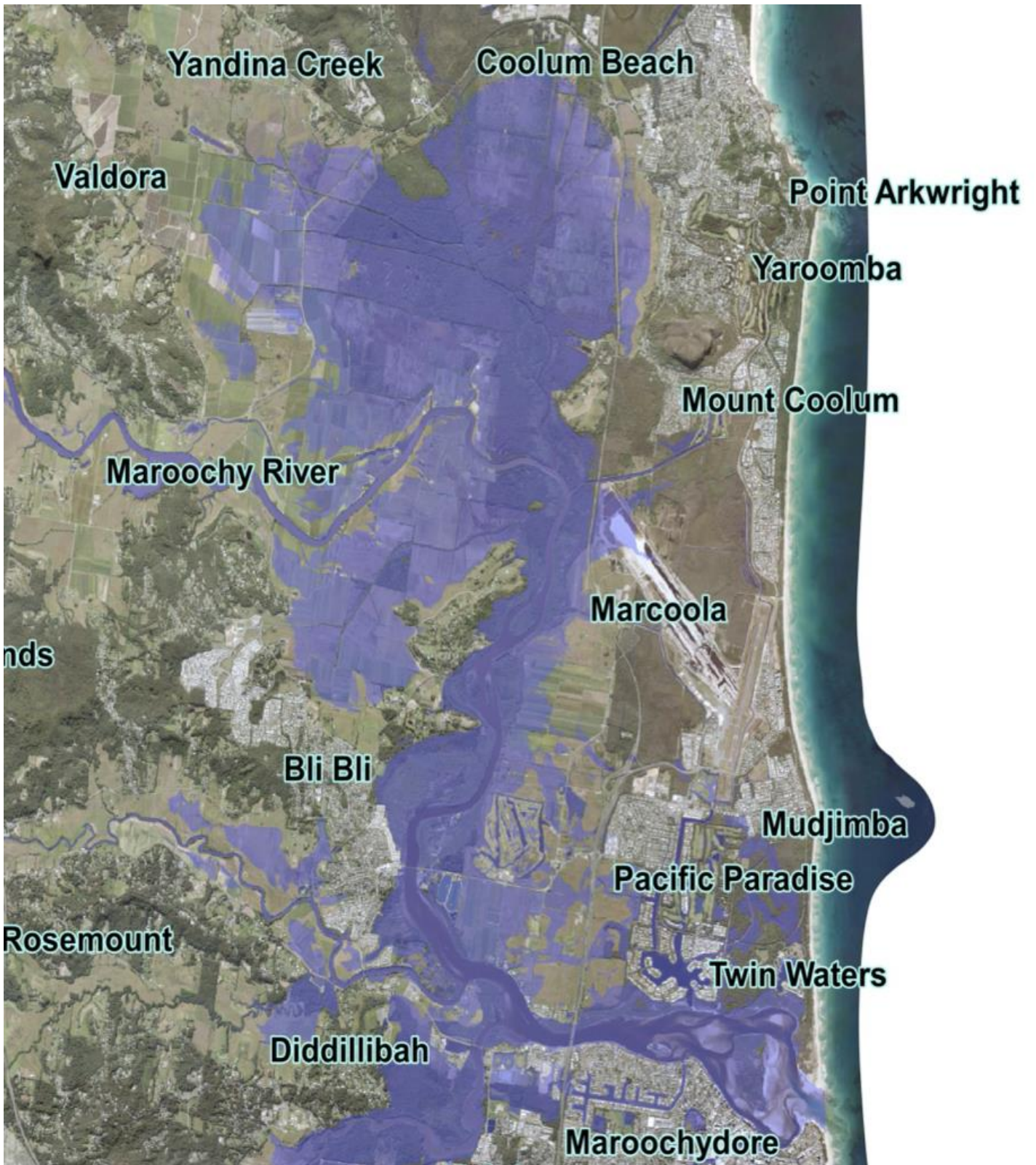




# Storm tide inundation - Present day

■ 1% AEP\*

AEP = Annual Exceedance Probability

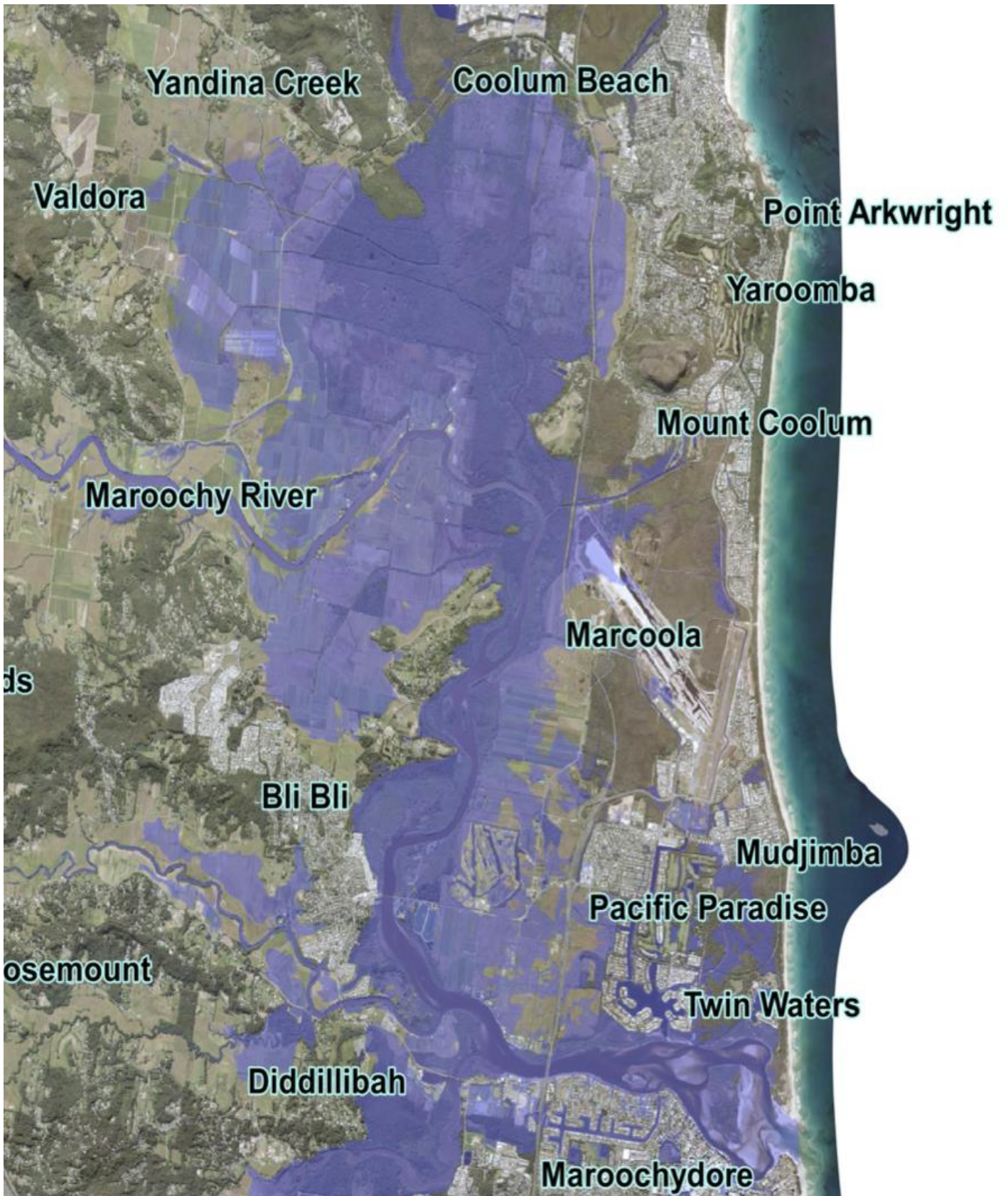




# Storm tide inundation - 2041

1% AEP\*

AEP = Annual Exceedance Probability

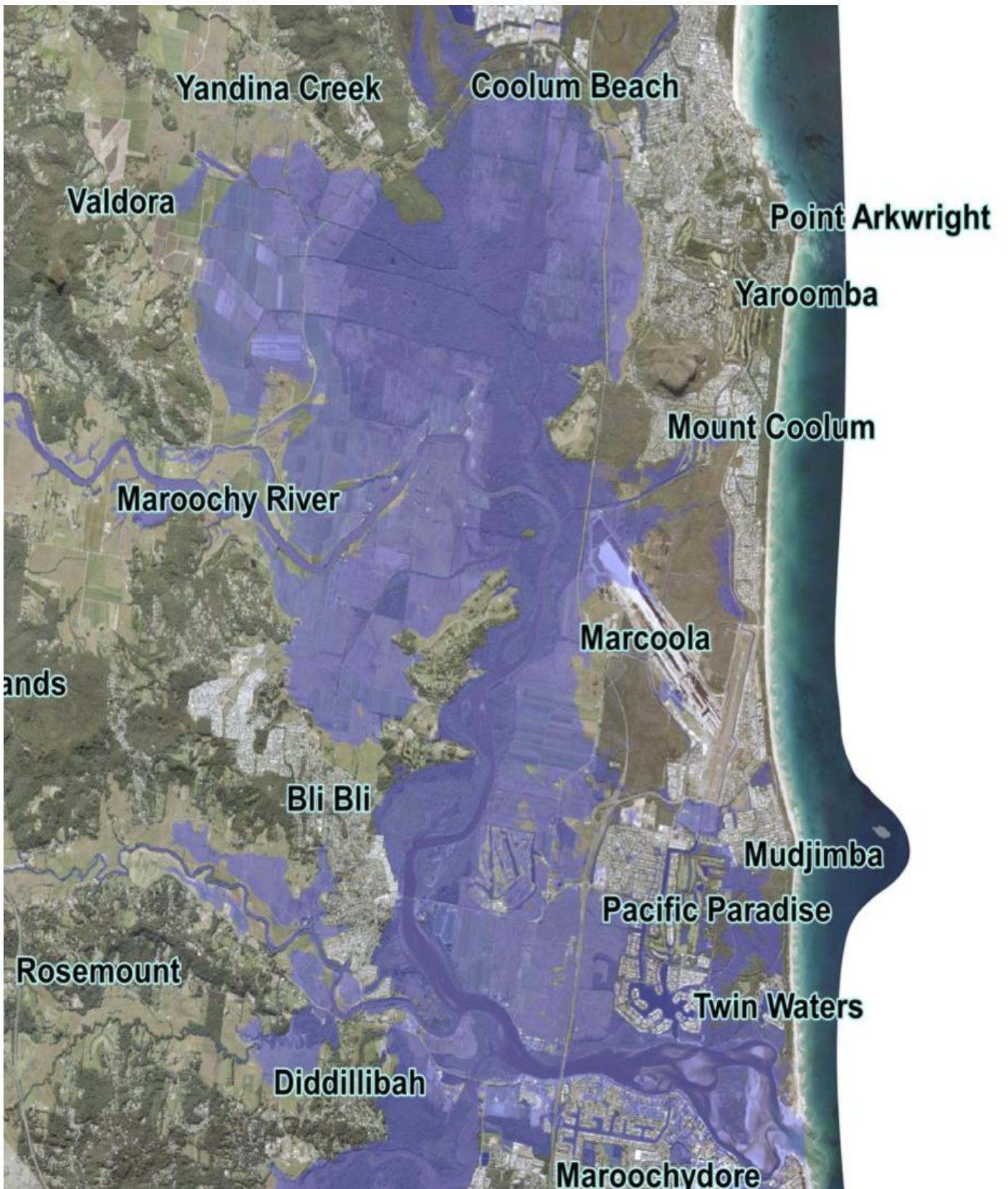




# Storm tide inundation - 2070

■ 1% AEP\*

AEP = Annual Exceedance Probability

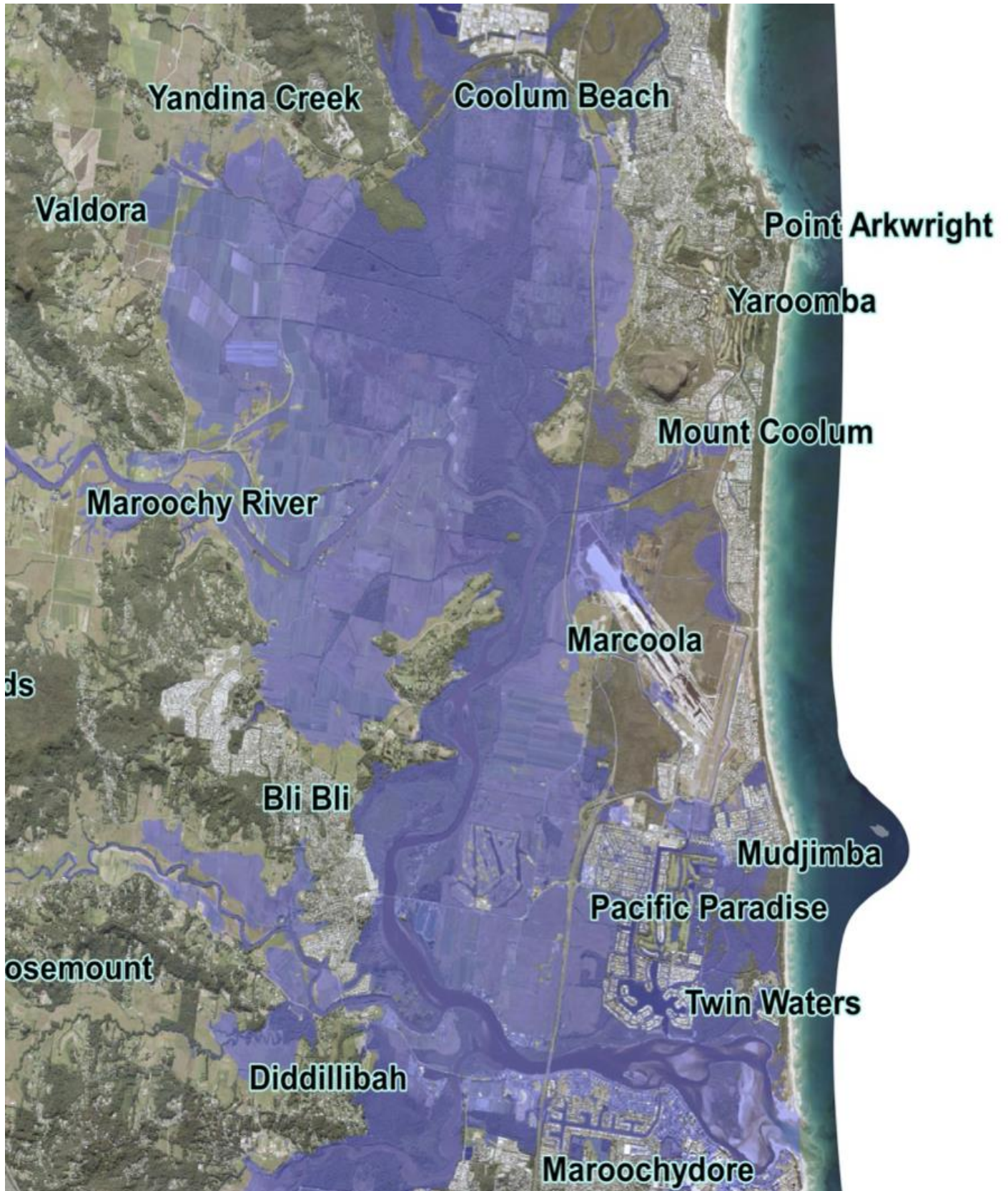




# Storm tide inundation - 2100

1% AEP\*

AEP = Annual Exceedance Probability



# Appendix 4

## CHAS Case Study – The Blue Heart

**Case study: The Blue Heart**  
The Blue Heart<sup>®</sup> is a floodplain area in the Maroochy catchment. It is recognised for its high biodiversity values and critical role in flood storage. It is also an area that has cultural significance to the Kabi Kabi Traditional Owners. The Blue Heart currently supports rural and agricultural activities, conservation, water quality nutrient and vegetation offsetting, carbon sequestration, and open space land uses.

The area is already flood-prone, and with rising sea levels, an expansion of the tidal area is expected. There is therefore an opportunity to transition the land to a wetland system over the next 80 years. These changes will result in an increase of ecosystem services.

**Ecosystem services** are the range of benefits that natural assets provide which contribute to human wellbeing.  
Inland wetlands such as the Blue Heart provide a range of ecosystem services, including climate regulation, carbon sequestration, flood regulation, habitat, and recreation and cultural values.

The estimated value of current agricultural land use is around \$2 million per year. The estimated value of transitioning to a wetland ecosystem is around \$12 million per year (Table 12). The value of wetland ecosystem services created by the Blue Heart expansion will exceed the value of any agriculture lost and strongly supports current transition initiatives.

**Table 12. Estimated value of gained wetland ecosystem services and foregone agriculture in 2100**

Estimated total value (\$ million/year)	Estimate	Potential higher end estimate
Estimated total value of wetland ecosystem services gained	\$12M	\$70M
Estimated total value of agriculture foregone	\$2M	\$3M