



Recognising and upholding excellence in local government

Mail: PO Box 105 Coolum Beach QLD 4573
Mob: 0433214320
Email: mail@oscar.org.au

22 April 2021

Ms Kate Whittle

Senior Policy Advisor

Office of the Hon Meaghan Scanlon MP

M: 0439 993 707 |

kate.whittle@ministerial.qld.gov.au

Dear Kate

Re: Talking points for request for meeting with Minister Scanlon re Consolidated Properties Group request for PDA declaration for an intense residential development accompanied by a wave pool at Coolum West.

As the "Community 6" we represent numerous resident, environment and community groups, both local and peak body, across the greater Sunshine Coast region. Overall membership of these organisations represents some 15000+ people across the broader Sunshine Coast and Noosa regions.

The community groups and community members we represent oppose the intense residential development and wave pool at Coolum West on the Maroochy River Floodplain

Background

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 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 site for the proposal – Planning and State Interests

Key planning issues with the proposal

- Existing Rural Zoning under the Sunshine Coast Planning Scheme 2014 (a consistent zoning carried through from earlier local planning instruments)
- Regional Landscape and Rural Protection Area designation under the SEQ Regional Plan 2017.
- 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).
- Flood Hazard Area under the planning scheme (the entire site is subject to Current Climate Riverine Flooding).
- The most limiting factor is 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.*

- 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.

The Blue Heart designation by SCRC, DES and Unity Water

- The site sits 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, including innovative and long-term "green and blue" recovery.
- Not surprisingly and with support of the community, the Sunshine Coast Regional Council has been consistent in not supporting Consolidated Properties Group proposal and has stated so publicly.

Role of the Blue Heart in long-term environmental and human health, incl. Coastal Hazard Adaptation Strategy

- 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 being finalised is expected to be presented to Council on 29 April 2021 for a decision.
- The draft CHAS refers to the future outlook relating to the Maroochy estuary and floodplain from a climate change perspective. Page 51 of the draft CHAS 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 draft CHAS also includes commentary re the potential future of the floodplain, 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.

Developer claims of community value disputed

The value of the much touted "wave pool" to the local community is strongly disputed by many including those 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.
- Their intent to extract water from the ecologically, socially and culturally important Maroochy River and pumped via a pumping system for the wave pool and "waterfront lots" is intolerable.

Conclusion

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.

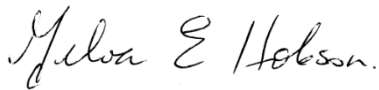
- The future for residents living in the area but particularly downstream of the Maroochy River, will be dependent on a viable flood storage and conveyance system and/in an area where tidal inundation will be permanent.
- No proposal for any further residential development on the Maroochy River Floodplain should be considered.

The Queensland Government has handled the Covid-19 pandemic in an exemplary manner. The community expects the State Government to take the same care for current and future generations who live on the Sunshine Coast.

Consolidated Properties Group request for a PDA declaration is ecologically, economically, socially and culturally unsustainable. It is a proposal that is totally at odds with sound planning principles, legislative frameworks and policies for ecologically sustainable development.

Yours sincerely,

Melva Hobson for:



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

