



10 September 2021

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Dr. Carl Ungerer, Senior Policy Adviser,
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Deputy Premier and Minister for State Development,
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Mr. Jason Camden,
Acting General Manager Economic Development Queensland
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Dear Carl and Jason,

RE: Intense Residential Development/Mixed Use and Wave Pool proposal for the Maroochy River Floodplains at Coolum West on the Sunshine Coast

In correspondence from the Office of the Deputy Premier and Minister (16 July) the following statements were included:

The Palaszczuk government strongly supports tourism and its important contribution to the Queensland economy.

A wave pool would certainly add to the tourism offering for the region.

However, the Deputy Premier is also aware of the concerns raised by a number of community organisations including OSCAR and the significant matters related to the proposed site for the project including substantial environmental, hydrological and other technical challenges.

I assure that these matters will be carefully considered in relation to any project of this nature presented to the Queensland Government.

As a result of these statements, concerns have been raised by the Community 6 - Coolum Residents Association (CRA), Development Watch (DW), Surfrider Foundation Sunshine Coast, Friends of Yaroomba (FOY), Sunshine Coast Environment Council (SCEC) and Organisation Sunshine Coast Association of Residents (OSCAR), all non-partisan groups representing some 10,000 plus residents across the SCRC and Noosa LGAs. These concerns, issues and questions follow.

Consistency of the proposal with the Planning Act 2016 and the need to consult with the relevant Local Government under the Economic Development Act

1. ***How consistent is the proposal by Consolidated Properties for a wave pool and residential subdivision with the Purpose and Principles of the Planning Act 2016?***
2. The residential and shopping centre are the key components of the proposal, with the wave pool being the “carrot”. We have tabled in every submission we have sent to you the advice to a resident from the then Treasurer and Minister for Planning, Cameron Dick MP, *that the residential and shopping centre components are prohibited activities under the SEQRP. Why then would the State Government through EDQ even consider such a proposal?*
3. In a number of sections of the Economic Development Act 2012 the following provisions relating to PDA developments are referenced, for example Section 58 Part 1 and 2(a) *Preparation of proposed development scheme (1) MEDQ must, as soon as practicable, prepare a proposed development scheme for the entire priority development area, or part of the priority development area, as mentioned in section 56(1) or (2). (2) However, before preparing the proposed scheme, MEDQ— (a) must consult, in the way it considers appropriate, with the relevant local government;* (our emphasis)
Given that the Sunshine Coast Regional Council (SCRC) is opposed to the Consolidated Properties proposal for Coolum West and has notified the State Government of same in writing does the State Government intend to override or ignore the Council’s objections?

Supposed tourism value

4. ***“A wave pool would certainly add to the tourism offering for the region.”***
Given the Sunshine Coast Regional Council is opposed to the proposal on this site and has indicated such in writing to the government, and that the Council is heavily involved in and well understands the tourism needs of the LGA, ***why would the State Government continue to consider this proposal at this site based on tourism outcomes?***
There are other wave pools proposed in the Sunshine Coast region and well advanced in the approval process. For example:

'Moby Vic's' Surf Park proposal.

It is MCU20/0381 & RAL20/0155 and the plans are at:

<https://publicdocs.scc.qld.gov.au/hpecmwebdrawer/RecordHtml/18342719>

<https://publicdocs.scc.qld.gov.au/HPECMWebDrawer/Record?q=containerEx:18342607#>

This proposal is purely for a wave pool with no associated 'housing development' and limited small-scale commercial development. Posting on Development.i suggests planning is well advanced.

5. **Given the proposal by Consolidated Properties for a “wave pool” and the Minister’s comment “A wave pool would certainly add to the tourism offering for the region”; and the current consideration being given to the Johnston Rd Glass House Mountains proposal (under the Planning Act 2016), as above, why would the State Government continue considering a proposal that the SCRC does not support and would not be allowed under the Sunshine Coast Planning Scheme and the SEQRP.**

Alternative tourism value for the Consolidated Property Group’s site at Coolum West

6. We have reminded all relevant government departments dealing with the Consolidated Property Group’s project of the MOU with the Department of Environment and Science, Unity Water and SCRC relating to the Blue Heart initiative, an initiative for the future from both an environmental perspective and tourism opportunities and supporting the Queensland Government goal of net zero emissions by 2050. ***Does EDQ value the Blue Heart initiative and see it also as an economic driver and tourism opportunity?***

Constraints of the Consolidated Property Group’s site and proposal

7. The community has sent updated submissions on several occasions outlining the planning, geographical, geological, environmental, human safety and wellbeing concerns relating to this project including that the whole site is covered by the Flooding Overlay on the Current SCRC PS. **Have these been read and understood by those assessing the proposal?**
8. Further, the Coastal Hazard Adaptation Strategy (CHAS) has been completed and adopted by resolution by SCRC. The land for this proposal sits on the Maroochy River floodplain and will not only be subject to a flooding overlay but is also subject to a storm tide inundation overlay, as indicated in the recently updated mapping presented to and adopted by SCRC.
9. We acknowledge the reference that the DP/Minister appreciates the issues raised by the Community 6 representatives, *significant matters related to the proposed site for the project including substantial environmental, hydrological and other technical challenges*. However, we are very concerned that these are seen as “challenges” as if they are “to be overcome”. ***Is the approach of the government to be that this proposal is so significant that severe constraints are to be overcome?***

During 2020 the concerned community groups posted a petition to which some 2600 people responded. We have included (as an attachment) a small representative sample of the 400+ comments made relating to this proposal.

As representatives of many in the Sunshine Coast community, we would appreciate a further meeting with you and we look forward to your response to these significant questions/issues.

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

