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8 December 2025

To: Deputy Premier, Minister for State Development, Infrastructure and Planning
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Dear Deputy Premier,

RE: PROPOSED COOCHIN CREEK MUSIC FESTIVAL AND EXHIBITION EVENT SITE – 1641 Roys Road, Coochin Creek

Re: Submission in Opposition: Material change of use to establish Outdoor Sport and Recreation (Outdoor music festival and exhibition event site).

1641 Roys Road, Coochin Creek, Lot 1 on RP86417, Lot 2 on RP86417, Lot 11 on SP261209

Your Ref: MBN25/1036 (advertised as MBN25/1069)

PREAMBLE

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit umbrella/peak organisation covering resident and community organisations on the Sunshine Coast and Noosa Local Government Areas (LGAs) in South East Queensland. These organisations are united by their determination that the Sunshine Coast and Noosa Planning Schemes serve the public interest.

OSCAR currently has over 36 member groups from the Pumicestone Passage to Noosa and from the Coast to the hinterland and ranges, with these organisations having collectively over several thousand engaged and community-minded members.

The OSCAR overarching **Vision** states: *“The residents of this region enjoy being part of a connected and engaged community living in an area of outstanding natural beauty. **They recognise that they are custodians of the unique and abundant biodiversity, beaches and green spaces of the region.**”*

In relation to aspects of Planning, OSCAR’s Vision document states:

Natural heritage - *It is recognised that the region’s forests, reserves, parklands, beaches, waterways and topographic features are to be preserved and maintained and recognised for their ecological, cultural, social and economic significance and for the residents’ sense of wellbeing. The remaining natural areas of the region will be protected for their inherent value because they*

appeal to the human senses; underpin the economy and tourism sector; provide recreational opportunities; and provide ecosystem services for current and future generations.

Cultural heritage - *The Traditional Owners' rich culture, their heritage and their continual relationship with the lands and waters of the Sunshine Coast are recognised.*

OSCAR, along with Local Government (LG), State Government, community, business and politicians are bound by the Planning Act 2016, where Chapter 1, Sections 3-7 states the:

Purpose of Act

*(1) The purpose of this Act is to establish an efficient, effective, transparent, integrated, coordinated, and accountable system of land use planning (**planning**), development assessment and related matters that facilitates the achievement of ecological sustainability.*

*(2) **Ecological sustainability** is a balance that integrates—*

(a) the protection of ecological processes and natural systems at local, regional, State, and wider levels; and

(b) economic development; and

(c) the maintenance of the cultural, economic, physical and social wellbeing of people and communities.

(3) For subsection (2)—

(a) protecting ecological processes and natural systems includes—

(i) conserving, enhancing or restoring the life-supporting capacities of air, ecosystems, soil and water for present and future generations; and

(ii) protecting biological diversity; and

(b) achieving economic development includes achieving diverse, efficient, resilient and strong economies, including local, regional and State economies, that allow communities to meet their needs but do not compromise the ability of future generations to meet their needs; and

(c) maintaining the cultural, economic, physical and social wellbeing of people and communities includes—

(i) creating and maintaining well-serviced, healthy, prosperous, liveable and resilient communities with affordable, efficient, safe and sustainable development; and

(ii) conserving or enhancing places of special aesthetic, architectural, cultural, historic, scientific, social or spiritual significance; and

(iii) providing for integrated networks of pleasant and safe public areas for aesthetic enjoyment and cultural, recreational or social interaction; and

(iv) accounting for potential adverse impacts of development on climate change, and seeking to address the impacts through sustainable development (sustainable settlement patterns or sustainable urban design, for example).

OSCAR OBJECTIONS RELATING TO THIS PROPOSAL

OSCAR wishes formally to object to the proposed Coochin Creek Music Festival and Exhibition Events Site. The proposal is clearly inconsistent with and one could say in opposition to the Purpose of the Planning Act 2016 as outlined above. Overall, our reasons are summarised as follows. The full commentary including references relating to the individual topics are included as Attachments 1-4.

Strategic Reasons relating to our objections:

1. Failure to align with State Planning Policy, ShapingSEQ and the Sunshine Coast Planning Scheme (as identified by Caloundra Residents Association for the Tourist Park and the Music festival site.) These reasons are even more relevant given the scale of the Music Festival proposal.)

Similar to the Tourist Park, this proposal conflicts with State Planning Policy (SPP) provisions for biodiversity, water quality, and natural hazards, and undermines ShapingSEQ 2023 objectives for protecting green corridors and rural landscapes.

The proposal conflicts with the expressed core values of the Northern Inter-Urban Break (NIUB) identified in ShapingSEQ 2023, which seeks to protect green corridors, biodiversity, and climate resilience.

It is inconsistent with the Rural Landscape and Rural Production Areas (RLRPA) designation and undermines strategic planning objectives for sustainable growth. Mr Comiskey maintains that his development proposal will be better for the environment than the existing strawberry growing activity. The President of the Strawberry Growers has made the following statement:

The Queensland Strawberry Growers Association Inc. strongly objects to any claims that strawberry farming practices formerly carried out in that area pose a danger to anyone or any waterways. As Queensland Strawberry Growers we take our role as caretakers of the land very seriously and the notion that we would be performing activities that would threaten our livelihoods or put at risk the healthy environment that we require to operate successful businesses is ridiculous.

In support of the growers of the area and their changing farming practices, endorsement of the statement made by the Strawberry Growers Association was received today by a Senior Scientist from the SEQ Regional NRM Group (SEQ Catchments/Healthy Land and Water) working with the agricultural sector between 2003 and 2022. She stated that "There were some standout farm management operatives and the others were trying hard to lift their game."

It conflicts with the Sunshine Coast Planning Scheme:

- ✚ particularly the Strategic Framework Theme 3: Environment and Landscape, Biodiversity, Waterways and Wetlands Overlay, Flood Hazard Overlay
- ✚ identifies this area as Rural Zone and Environmental Management and Conservation Area, incompatible with intensive tourism uses.
- ✚ reinforces the NIUB as a non-urban buffer critical for regional identity and ecological integrity.

The Planning Scheme was subject to extensive community consultation and should not be undermined by a Ministerial decision when the State Assessment and Referral Agency (SARA) has also advised there is no economic need in the public interest and no significant adverse economic, social or environmental impact on the community if the development were not to occur in this location.

2. There is no legitimate reason for the proposed Music Festival and Outdoor Exhibition Event centre to be located in a protected green-belt area. SARA identified that there are other suitable areas, not in a protected area, for such parks.

SARA recommendation

The State Assessment and Referral Agency (SARA) has recommended refusal of this application, citing:

- ✚ non-compliance with planning regulations
- ✚ adverse environmental impacts
- ✚ lack of public interest justification – no significant adverse economic, social or environmental impact on the community if the development is not carried out
- ✚ no unique locational requirement for the project to be situated within the NIUB
- ✚ there are alternative suitable locations outside the NIUB for such a development
- ✚ recognised adverse environmental impacts on the Ramsar wetland and community amenity
- ✚ no compelling reason why the development must be in the NIUB.

SARA's assessment indicates environmental considerations are the primary state interest that should inform the decision.

3. The Economic assessment is flawed, unsubstantiated and should not be given any weight.

- ✚ The report does not show net benefit. It leaves out public costs such as traffic management, emergency services, and environmental protection.
- ✚ No Cost-Benefit Analysis was done. Queensland guidelines recommend this for big projects to weigh all costs and benefits, including environmental risks.
- ✚ Jobs are reported in large numbers, but many are short-term event gigs, not ongoing positions.
- ✚ State experts (SARA) found there is no overriding public need for this development and raised serious safety and environmental concerns.
- ✚ Approving this based on inflated economic claims would ignore the Planning Act's goal of ecological sustainability and long-term community interest.

In short: The economic case is weak and does not outweigh the environmental and safety issues.

4. Lighting Impacts of Development on the Sunshine Coast in terms of retaining a healthy and resilient Environment (See Attachment 1 for further detail and analysis)

A Festival site, and associated camping site, will increase Artificial light at night (ALAN) by their nature i.e. increased population requiring safety lighting, use of lighting associated with music shows including lasers and potentially fireworks.

The DA does not include measures to mitigate ALAN. This represents a significant change from what is effectively a dark sky area, with the 28 or so existing residents choosing to reduce their night movements so harm does not occur to wildlife.

ALAN poses well-documented health risks to humans, including sleep disruption, metabolic and cardiovascular issues, reduced immune function, and impacts on mental wellbeing.

ALAN poses significant harm to wildlife and ecosystems, particularly in the adjacent RAMSAR-listed Pumicestone Passage, by disrupting behaviour of migratory shorebirds, sea turtles, insects, and other nocturnal species; local skyglow has already increased by over 50% in recent years.

The proposed development is unlikely to meet national light-pollution guidelines, and its approval would undermine Sunshine Coast Regional Council's environmental objectives.

OSCAR recommends that the Minister not approve the development application.

5. Management of Bushfire Risk for the Development of an Outdoor Music Festival and Exhibition Event Site at Coochin Creek, Sunshine Coast – see Attachment 2 for further detail and analysis

The festival site is proposed to be almost surrounded by forests with high risk of bushfire. The area has seen bushfires burn up to the site boundary twice in 10 years. Planning has been developed for a fire intensity with a 5% chance of being exceeded in any one year. Fire intensity however is increasing in Queensland from both climate change and during El Niño events. The criteria applied to design the site will increasingly become inadequate.

Crucially, the bushfire planning did not consider the impact of embers on a camp ground capable of being easily ignited and of burning quickly. The impact of embers on the festival site was also neglected. There have been numerous reports of extensive damage to properties when fires jump large distance through embers. This omission places people at risk.

The site is serviced by a single dead-end road that passes through high risk forest for most of its length. This road is projected to cause significant traffic delays even under traffic control. Problems during an emergency evacuation are even more likely.

The site is a poor selection given the high forest cover adjoining the site made worse by the single and potentially dangerous single road access.

OSCAR recommends that the Minister does not put people at risk when it is not necessary to do so.

6. Management of Noise Issues of an Outdoor Music Festival and Exhibition Event Site at Coochin Creek, Sunshine Coast – for further detail and analysis please see Attachment 3.

The festival site has been proposed to be in a quiet rural environment adjacent to residences and high value protected environmental areas. The applicant seeks permission to change the land use type to allow festivals associated with very high noise emissions well above current noise levels and exceeding State noise levels for health and well-being. The proposed noise levels are at compliance levels even though almost half of music events in south east Queensland regularly exceed compliance noise levels.

The surrounding areas potentially have a large number of protected fauna species. It is widely accepted amongst researchers that noise can have detrimental impacts on fauna presence and condition. Though the site is to have intermittent events, even short duration high noise emissions can impact on predation, breeding and notably migratory birds at noise levels well below those proposed for the festival site. Impact on the national park and Ramsar wetlands species are highly likely.

Given the assured exceedance of noise levels for health and well-being and highly likely impacts to fauna of the national park and Ramsar wetlands:

OSCAR recommends that the Minister not approve the development application that has disregarded both its human and wildlife neighbours that would expect protection under state policies and the planning scheme.

7. Hydrology Issues of the Outdoor Music Festival and Exhibition Event Site at Coochin Creek, Sunshine Coast – for further explanation and analysis please see attachment 4.

The proposed festival site is serviced by a single road for access. This road is low lying in part and subject to frequent flooding (a 2-year ARI event). The planning for evacuation during a road closure event has determined warning times and isolation periods assuming vehicle can pass through flood waters up to 250 mm depth. This planning conflicts with the State *It's flooded, forget it* programme.

Planning to protect the immediately adjoining ecologically significant Ramsar wetlands, national park and threatened ecological communities ignored State requirements of the Environmental

Protection (Water and Wetland Biodiversity) Policy. Runoff from a camp ground catering for up to 15,000 people and a festival site that may have 35,000 patrons in a day has not been assessed as required under the Sunshine Coast planning scheme.

Site development locates camping sites, car parks, festival grounds, amenities block, permanent roads and permanent buildings in designated riparian protection areas. These buffer areas are required under the planning scheme to be protected.

The proposal has failed to undertake and plan for protection of the high value ecological communities adjoining the proposed site. The single access road is subject to frequent flooding and the planning for evacuation under flooding conditions has assumed travelling through low flood waters, which is widely considered an unsafe option.

OSCAR recommends that the Minister not approve the development application that has significant omissions relating to public safety and protection of highly significant ecosystems and species.

8. One way in and out access via Roys Road presents serious safety concerns to guests, visitors and locals owing to its passage through a high bushfire risk area with limited emergency access. SARA makes reference to the Roys Rd access to and from the site, including going through a 6km stretch of pine plantation that is identified as having high-intensity bushfire risk! The following issues relate to Roys Road (East):

- ✚ Single ingress and egress via Roys Rd (East) through a high-intensity bushfire zone. This is a narrow, unlit rural road with many blind spots.
- ✚ 35000 people coming and going in vehicles on a single lane, rural road where wildlife often crosses or sits.
- ✚ Unsafe for caravans (impossible to manoeuvre quickly on blind corners with two single-lane bridges, one in a flood zone).
- ✚ For drivers not used to Roys Rd, there is a real likelihood of two caravans having an accident when trying to pass.
- ✚ This road has been blocked in the past by bushfires and floods.
- ✚ Roys Rd between the single lane bridge to 1806 is prone to flooding several times a year, potentially preventing patrons and workers from accessing or leaving the site, and increasing risky driving through flood waters.
- ✚ Emergency services are also unable to get through in fire and flood.

SUMMARY/CONCLUSION

1. Destination 2045 states that Queensland will provide 'Low-impact, high-quality responsible ecotourism opportunities in suitable protected areas, including through partnerships with the private sector'. This proposed development is neither low-impact or responsible, as evidenced by the fire rating of the surrounding area and potential impacts of the development on biodiversity, wildlife, hydrology, surrounding residents and is not ecotourism and is definitely not located in a suitable area.
2. It is inconsistent with the Purpose of the Planning Act 2016 and does not align with State Planning Policy, Shaping SEQ and the Sunshine Coast Planning Scheme. If one considers the Purpose of the Planning Act **which binds all people** including politicians and is based on the Principle of Ecological Sustainability, being a "balance that integrates" across, environment, economic and human wellbeing it would appear then that if the Deputy Premier approves this development then he believes that the supposed economic development as proposed by the developer outweighs any *environmental, safety cultural,*

economic, physical and social wellbeing of people and communities. We ask the Minister to please explain his stance on this issue.

3. The Northern Inter-Urban Break (NIUB) greenbelt represents decades of careful, bipartisan planning and strong community commitment to preserve critical natural buffers between Moreton Bay and the Sunshine Coast. Political leaders must recognise and acknowledge the significance of maintaining this greenbelt and the environmental values of the Pumicestone Passage. Development proposals that threaten these spaces risk long-term damage to the liveability, character, and ecological health of our region.

As Shannan Roy, Local Resident (Coochin Creek) says:

"This proposal is a high-impact, development. It will bring noise, light, and vehicle pollution to a peaceful rural area and damage the Ramsar-listed Pumicestone Passage. As someone whose family built Roys Road and farmed this land for generations, I can say with certainty this is the wrong place for this kind of development."

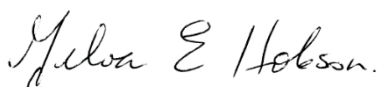
4. The State Assessment and Referral Agency's (SARA) recent assessment and recommended refusal of this application clearly demonstrates this proposed festival site and tourist park are not consistent with many significant State Interests, and for which, according to SARA, there **is not an "overriding need in the public interest"** for the proposal on this sensitive site.
5. The economic case is weak – The applicant's projections are speculative, broad, not supported by SARA and fail to account for infrastructure costs, environmental management.
6. Risks to Pumicestone Passage (Ramsar wetland), local biodiversity, and rural and local community amenity are unacceptable.
7. Transport and bushfire safety issues remain unresolved.

OSCAR calls on the Deputy Premier and Minister for Planning to make his decision relating to both the Tourist and Festival sites, that is based on scientific analysis and feedback and expectations of the local residents and communities as represented by the immediate residents, those located surrounding the site and across the Sunshine Coast region as represented by members of the Coalition of some 10 community organisations on the Sunshine Coast and advice from his own State Assessment Referral Agency (SARA).

We also put to the Minister the following question: Do you want your legacy as Deputy Premier and Minister for Planning to be an unsafe, unsound, non-compliant development that puts wildlife, the environment and people in harm's way, based on a flawed economic assessment?

For these reasons, OSCAR urges you to refuse this development application.

Yours sincerely



Melva Hobson PSM

President

Organisation Sunshine Coast Association of Residents Inc. (OSCAR Inc)

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