

Development Watch Inc

PO Box 1076, Coolum Beach, QLD, 4573



ABN 53 627 632 278

www.developmentwatch.org.au

president@developmentwatch.org.au

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Chief Executive Officer /Assessment Manager

Sunshine Coast Council

By Email: mail@sunshinecoast.qld.gov.au

NOTICE OF SUBMISSION

Applications: MCU17/0095, MCU17/0096 & REC17/0056

SH COOLUM PTY LTD

Proposal:

(Combined)

- Preliminary Approval (in accordance with section 242 of the *Sustainable Planning Act 2009*) for Material Change of Use of Premises to establish Yaroomba Beach Master Plan
- Development Permit for Material Change of Use for Resort Complex, Multiple Dwellings, Short Term Accommodation, Shopping Centre, Educational Establishment, Community Use and Utility Installation
- Development Permit for Reconfiguration of a Lot - 10 lots into 26 lots (Creating 16 Dwelling House Lots, 2 commercial lots, 1 park lot, 1 access lot, 2 buffer lots, 1 transfer station lot, 1 principal body corporate lot & 2 balance management lots and access easements)

Address:

David Low Way YAROOMBAA

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EXECUTIVE SUMMARY

This submission has been prepared by Development Watch Inc, a community group based in Coolum. We provide input to the State and to Sunshine Coast Council on legislation that controls development. We also monitor applications for development applications in the Coolum area that the community we represent considers inappropriate. The subject of this submission is such an application.

SH Coolum Pty Ltd has submitted combined applications to construct a tourist resort on land it owns at David Low Way, Yaroomba. This company is wholly owned by Sekisui House Australia Pty Ltd. In early 2017 Sekisui House started to use the business name, 'Yaroomba Beach' and purged the name 'Sekisui' and the Sekisui logo from its extensive advertising. In our submission, we refer to the landowner and applicant as 'Sekisui' or SH.

In 2014, Council made an agreement with Sekisui to consider an amendment to the Sunshine Coast Planning Scheme 2014 (SCPS2014). The purpose of this proposed amendment (the Sekisui Amendment) was to facilitate approval of a future development application by Sekisui on its 19ha site at David Low Way, Yaroomba. The proposed amendment would have allowed the construction of a hotel and 1,350 apartments, housed in 17 buildings between four and ten storeys high. Primarily as a consequence of a huge public outcry by the affected community, and by a thorough analysis leading to the recommendation by Council staff not to amend the SCPS, Council decided in 2015 not to proceed with the amendment.

Sekisui's current application proposes the construction of a 220-room hotel and around 1,000 dwellings on the subject site. The hotel and two serviced apartment blocks are proposed to be 7 storeys high and the balance of dwellings will be housed in 2, 3 and 4-storey buildings. This is the largest "integrated tourist resort" ever proposed for the Sunshine Coast.

This application is seriously in conflict with the Strategic Framework of SCPS2014. These conflicts are amplified when the application is assessed against the Coolum Local Plan Code. The major areas of conflict are detailed in our submission and relate to:

1. Excessive Building Height. SCPS2014 requires assessment against a height limit of 8.5m. Most of the proposed buildings are well over this limit with three buildings exceeding 23m. The Strategic framework dictates that buildings of this scale must be confined to the Enterprise Corridor. Such heights, and the expanse of three and four storey apartment blocks have serious consequences for visual amenity and ecological protection.

2. Degradation of Visual Amenity. Over 50,000 visitors per year appreciate the view of the Coolum coastline from vantage points atop Mount Coolum. The Strategic Framework requires such views to be protected. The subject site, filled with buildings to seven storeys would introduce severe and permanent degradation of this experience. In addition, the development would be a blight on the views of a very large number of residents who reside on nearby 'vantage' points.

3. Ecological Damage. Nesting loggerhead turtles (endangered) and green turtles (vulnerable) are frequent visitors to the beach adjacent to the subject site. There is compelling evidence that light from the proposed development would deter nesting turtles from coming ashore. This same light would also disorientate hatchlings and greatly increase morbidity. We believe Sekisui has not complied with Federal legislation that requires proponents of such a development to refer its proposal to the Federal Government for assessment.

4. Unacceptable Dwelling Density. Sekisui proposes to house around 2,000 permanent residents on the subject site. In addition the hotel and associated facilities could easily attract over 1,000 people on any given day. Such density would swamp not only Yaroomba but also Coolum Beach. The Strategic Framework requires such high-density developments to be located in the Enterprise Corridor and also requires development to the north to be much less intense.

5. Resort Viability Threatened. There is credible evidence available that the viability of a resort development is severely compromised when it is integrated with large-scale residential development. We believe the viability of the proposed resort would be severely compromised, primarily because of the high probability of conflict between resort guests and permanent residents. In addition, Sekisui has provided information that indicates the hotel will be in the midst of a construction site for 10 years after it opens. It will not be a desirable destination for guests seeking a 5-star experience.

6. NO Focus on Tourism. The SCPS identifies the site as a "tourism focus" site. Sekisui's extensive advertising has promoted this and the proposed hotel and associated facilities. However, Sekisui's application is to develop the site as an intensive residential compound of over 1,000 dwellings with a hotel in the northeast corner. The opportunity to capitalise on "tourism focus" category for the site with a 5 or 6 star eco - resort complex utilising the

whole site would be lost forever if this inappropriate, largely residential development was approved.

7. Traffic Impacts Underestimated. Development Watch has examined the material provided by Sekisui regarding traffic flows and intersection performance. We believe the traffic volumes have been underestimated because of poor-quality base data and because some traffic-generating inputs have not been considered. In addition, we believe that no satisfactory solutions to the redesign of two major intersections has been presented.
8. Degradation of the 'competitive advantage'. We can do no better than quote from the agenda paper for Council's Special Meeting on 25 April 2015. This meeting sealed the fate of the 'Sekisui Amendment'. The Staff Report stated, *"A key component to the attractiveness of the Sunshine Coast as a tourism destination is its 'natural advantage' which is its point of difference to other regions in South East Queensland and elsewhere. Any proposal to develop large scale international tourist hotels and facilities should also have regard to this branding and image aspect. Indeed, the predominant form of coastal development north of the Maroochy River is characterised by development that is subservient to the natural landscape in which it is located. This has been based on a long held and consistently applied planning policy."*
9. Transfer of wealth from local residents and other tourism operators to the developer, Sekisui. The degradation of the views currently available to well positioned residential dwellings and tourist facilities in the vicinity of the Yaroomba Beach site has implications for their property values. It is DW's view that if this application was approved, Sekisui would be the beneficiary and local residents, visitors and tourism operators the losers.
10. Flawed Analysis of Economic Benefits; The economic benefit analysis fails to take account of the proposed "premium" hotel and convention facilities to be built in the new Maroochy CBD and the impact on patronage. Other inadequacies include overestimation of the economic benefits of construction of residential dwellings given those same benefits would accrue if these were constructed in more appropriate locations.
11. A Dangerous Precedent. Approval of Sekisui's application would require turning a blind eye to a large number of policy provisions laid out in the Strategic Framework. It would clearly illustrate that Council is unable to maintain a policy position on development on the Sunshine Coast. If this application succeeds, communities throughout the Sunshine Coast

could rightly conclude that SCPS2014 provides no certainty for the future and other more intense high rise developments approved.

12. Public Interest not Served. The public interest will not be served by approving a high-density housing estate and a high-rise hotel on the subject site. The community has made its concerns well known to Council with rallies, signs and public meetings. Submissions against this proposal will number in the thousands. Local residents of the Coolum Local Area (which includes Yaroomba) have consistently told Council that they want to maintain a low rise environment. The public interest is not served if the interests of those who have already invested in the area are overridden to meet the interests of a development company. Nor is it served if a prime tourism focus site becomes mainly a residential development; or if the development degrades the Coast's competitive advantage; or degrades the views from key vantage points thereby diminishing the tourism value of this part of the coast.

13. Community Engagement Flawed. Sekisui's various attempts at community engagement in the lead-up to and during the public Notification Stage were designed to support the outcome it wanted. No credibility can be ascribed to the results it has published. Saturation advertising to promote the hotel concept ensured the general public was unaware that the proposed development was primarily a high-density housing estate.

Conclusion

Development Watch has presented evidence of serious conflicts with SCPS2014. The application minimises the significance and extent of these conflicts which would undermine the character of the Coast north of Maroochydore, degrade the Coast's competitive advantage and degrade the lifestyle of both Coolum residents and visitors. There is no pressing need for the hotel and convention centre nor for the huge number of apartments proposed. Economic benefits would be modest at best and in our view the hotel will fail.

Sekisui has not presented sufficient grounds to justify approval of its application despite these serious conflicts. **We urge Council to refuse the application in the long term interests of the Sunshine Coast.**

INTRODUCTION

The Applicant, Sekisui House (SH), has lodged an Application to build a residential development of over 1000 dwellings. Added to this, the SH Application includes three high rise towers, one of which is proposed to be a 5 star hotel and the others, serviced apartments.

Clearly this is a totally inappropriate proposal. The proposed density, the three high rise towers and the mix of 2, 3 and 4 storey structures is totally out of character for the area.

The proposal significantly conflicts with multiple aspects of the Sunshine Coast Planning Scheme 2014 (SCPS) – the relevant Local Plan (Coolumb), the Strategic Framework and various codes.

SH put forward a similar proposal in 2015 seeking major amendments to the SCPS 2014. Council rejected the proposal. In assessing the proposed amendments Council staff (even after considering a scaled down version of the then SH proposal) concluded that :

*“... the Sekisui House development concept is of a **scale and intensity that is incompatible with the existing character of the local area as it would introduce built form elements of a significant scale (height and width) that are at odds with the prevailing built form of Yaroomba and would be more appropriate to establish in an Activity centre within the Enterprise Corridor;***

Whilst the Applicant claims that the proposal now before Council is different and addresses Council’s concerns, in essence this proposal is **still incompatible with the existing character of the local area and would still introduce built form elements of a significant scale (height and width) that are at odds with the prevailing built form of Yaroomba** ... and should be rejected for the same reasons. There are no compelling public interest reasons to override the SCPS 2014.

This submission outlines the significant issues of concern to the community and the conflicts with the SCPS 2014 and other relevant documents. The views expressed are the strongly held views of DW.

Major issues are addressed below.

A. BUILDING HEIGHT

1. BUILDING HEIGHTS EXCEED THE LIMIT AND ARE INAPPROPRIATE

The Coolum Local Area Height Overlay Map (Map OV11H) indicates the site is subject to a building height limit of 8.5 metres. This was the height limit recommended by Council when the SCPS 2014 was formulated.

The Applicant proposes an extensive number of buildings up to 24.5 metres in height.

Other than the two storey buildings, all the proposed buildings significantly exceed the 8.5 metre height limit.

The definition of “finished ground level” was changed last year to deal with the increased risk of flooding due to climate change. An additional metre of fill may be required on the site. However, this means that some or all of the proposed buildings would effectively be a metre higher than anticipated. We note that a previous approval in 2007 required fill to 5.5m and that the Applicant’s flood report uses RL 30.5 (building height of 24.5m plus 5.5m).

Currently, development in the area generally does not exceed a height of 8.5 metres.

2. BUILDING HEIGHTS CONFLICT WITH THE COOLUM LOCAL PLAN

The SCPS Strategic Framework¹ states:

“The Sunshine Coast is maintained as a community of communities where the character and identity of each community is recognised and protected in accordance with a local plan.

The SCPS 2014 anticipates development consistent with the established low-key coastal residential area and includes the following statements of planning intent:

From the Coolum Local Plan Code overall outcomes -

7.2.8.3 (2)(a) *The Coolum local plan area **remains a low key coastal community** ...*

7.2.8.3 (2)(c) *...uses which **enhance the beachside character**... are encouraged ...*

¹ SCPS Strategic Framework, Theme 1, Element 8. S3.3.9.1(a)

7.2.8.3 (2)(j) *[Development on the site] is configured in a series of beachside villages and other precincts that **sit lightly on the landscape...***

and

the Height of Buildings and Structures Overlay Code (8.2.8) anticipates

(c) *development does not result in a significant loss of amenity for surrounding development, having regard to –*

(iv) *building character and appearance; and*

(v) *building massing and scale relative to its surroundings.*

The SH proposed high-rise and intensive development conflicts with each of these requirements. Not only is the scale and density of this development directly and comprehensively in conflict with the expectations outlined as low key and sitting lightly on the landscape but, in our view, will detract rather than enhance the beachside character of the area.

The Code for building heights in the Coolum Local Plan² states –

...(2) *The purpose of the Height of Buildings and Structures Overlay Code will be achieved through the following overall outcomes:-*

...(b) ***the height of buildings and structures is consistent with the reasonable expectations of the local community;***

3. HEIGHTS ARE NOT CONSISTENT WITH LOCAL COMMUNITY EXPECTATIONS

The Height of Buildings and Structures Overlay Code states at 8.2.8.2 –

...(2) *The purpose of the Height of Buildings and Structures Overlay Code will be achieved through the following overall outcomes:-*

...(b) ***the height of buildings and structures is consistent with the reasonable expectations of the local community.***

The proposed height of this development is a major concern to the local residents.

- In 2005 when Lend Lease proposed to build a residential development over the then beachside golf course holes of the former Hyatt Regency Coolum, there were thousands of objections to it;

² SCPS 8.2.8 Height of Buildings and Structures Overlay Code

- When SH purchased the land in 2010 they committed to build in accordance with the Master Plan over the site³;
- In the development of the SCPS 2014 the community was very vocal about their desire to maintain the low level character of the area;
- When SH proposed amending the SCPS 2014 soon after it was gazetted, in order to accommodate multiple high-rise towers, the community made their views clear with rallies, protests, signs on their properties, public meetings etc.

The current SH proposal fails to meet this outcome – clearly and consistently the community expectations for low level, low key developments have been expressed.

Given that the SCPS 2014 reflects that expectation, and that this has been a Council planning policy for some considerable time, the community expectations fit the requirement to be “reasonable expectations”.

The SH development proposal is totally inappropriate for the site at Yaroomba.

³ Sunshine Coast Daily, “Residential community gets boost” 22 September 2010

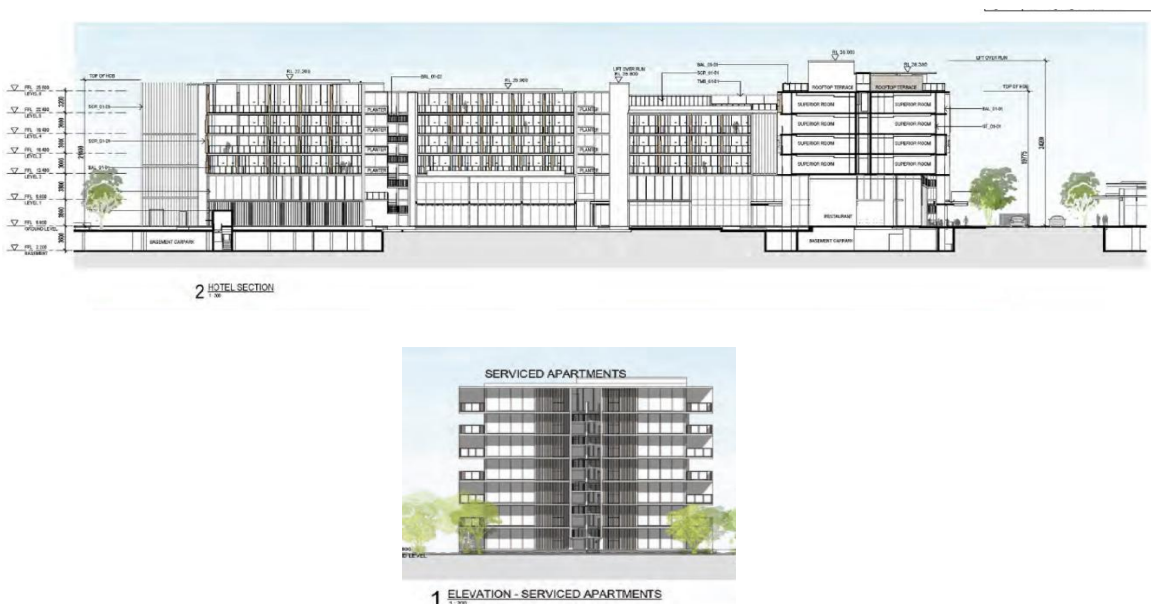
B. CHARACTER

1. CONTRARY TO THE DESIRED CHARACTER OF THE LOCAL AREA

Development around the site is primarily low-rise housing and of course the former Hyatt Regency Cooloom is a low-rise, low-key resort.

The proposed building heights in this proposal are grossly out of character with the Yaroomba area. The very significant difference in character is obvious in the following extracts from SH's Application of the hotel and one of the serviced apartment buildings.

Extract from the Development Application showing the proposed hotel and one of the serviced apartment buildings. (NB.. These have been reduced in size for the purposes of this document, so scale may not be exact).



Council's 2015 staff report when Council voted not to amend the SCPS 2014 stated :

- (i) ***the Sekisui House development concept is of a scale and intensity that is incompatible with the existing character of the local area as it would introduce built form elements of a significant scale (height and width) that are at odds with the prevailing built form of Yaroomba and would be more appropriate to establish in an Activity centre within the Enterprise Corridor, or other Major development areas as identified in the Sunshine Coast Planning Scheme 2014; and ...***
- (iii) ***a review of the Sekisui House development concept by the Urban Design Advisory Panel has identified a number of significant concerns about the configuration and design of the proposal which ... due to the scale and height of buildings, also results in adverse impacts on character and identity, and regionally significant views...***

Whilst this proposal is a slightly scaled down version of what was previously proposed in 2015 when SH sought an amendment to the SCPS 2014, this Development Application seeks approval for buildings that are nearly three times the permissible height so the above comments are still applicable.

2. CONFLICTS WITH THE SCPS 2014

The proposed scale and height of this development is totally out of character with Yaroomba and the Coolum Local Plan area. The SCPS 2014 seeks development consistent with the established low-key coastal residential area.

The SCPS Strategic Framework⁴ recognises the need to protect the Sunshine Coast as a community of communities where the character of each community is protected in accordance with a local plan. It states –

The Coolum Local Plan Code overall outcomes state –

*7.2.8.3 (2)(a) The Coolum local plan area **remains a low key coastal community** ...*

*7.2.8.3 (2)(c) ...uses which **enhance the beachside character**... are encouraged ...*

*7.2.8.3 (2)(j) [Development on the site] is configured in a series of beachside villages and other precincts that **sit lightly on the landscape**...*

The SCPS Strategic Framework also anticipates that:

In 2031, the Sunshine Coast has a strong sense of community identity based upon the retention of its character, lifestyle and environment attributes.

The character and scale of this proposed development fundamentally conflicts with the character and scale of development intended for the site under the SCPS 2014.

⁴ SCPS Strategic Framework, Theme 1, Element 8, S3.3.9.1(a)

C. SCENIC/VISUAL AMENITY

1. SCENIC AND VISUAL AMENITY WILL BE IMPEDED/COMPROMISED

A. YAROOMBA HAS A HIGH LEVEL OF VISUAL, SCENIC AND CULTURAL VALUE

COOLUM LOCAL PLAN AREA Figure 7.2.8A (Coolum Local Plan Elements)



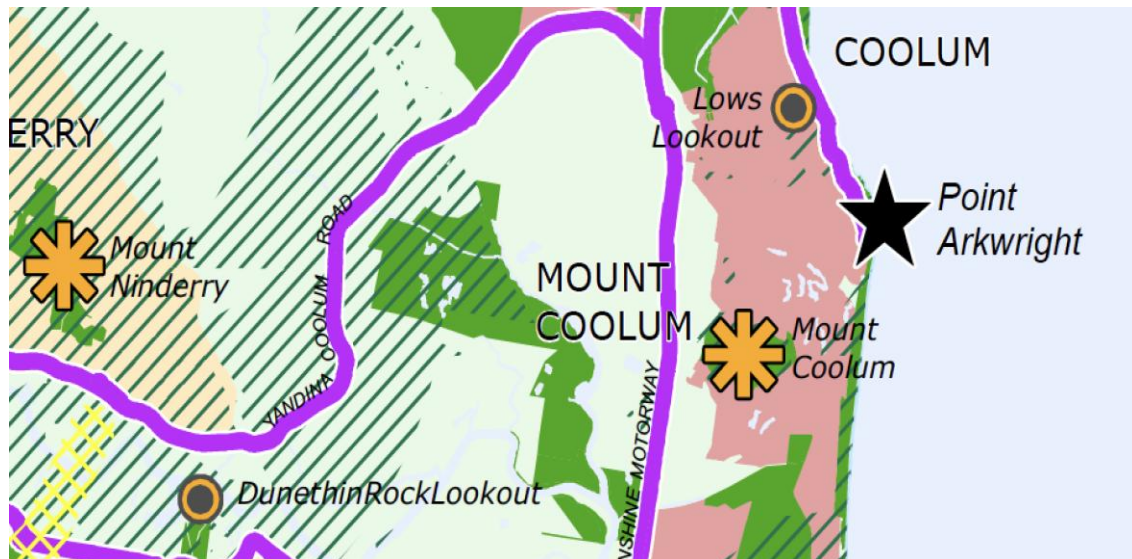
<https://doi.org/10.1186/1475-2875-9-139>

As can be seen from the above Figure Map, there are many significant views, mountains/hills,

headlands in and around the subject site.

The Extract from SFM6 (below) further confirms the area is scenically significant.

EXTRACT FROM SFM6



Strategic Framework Map 6 Community Identity, Character and Social Inclusion Elements

Community Identity, Character and Social Inclusion Elements

- Coastal Urban Setting
- Rural Town Setting
- Rural Village Setting
- Rural Residential Setting
- Rural Setting
- Major Conservation Area
- High Value Scenic Area
- Scenic Route
- Mountains and Hills
- Major Escarpment
- Lookout
- Headland

Some specific outcomes of the Strategic Framework are ...

- 3.8.2... (a) *The landscape elements identified conceptually on SFM6 (Community identity, character and social inclusion elements) which include regional and sub-regional inter-urban breaks, **high value scenic areas**, regional gateways and **scenic routes are protected and enhanced** ...*

This is a proposal for an increase in building height up to 3 times that allowed under the SCPS 2014 and is in stark contract to the density and character indicated for this area under the SCPS 2014.

B. PROMINENT LANDSCAPE FEATURES

3.8.2 of the Strategic Framework provides –

(c) *“The **prominent landscape features** which contribute to the diversity and richness of the Sunshine Coast landscape, including **beaches, headlands, high dune systems**, creeks and rivers, islands, **mountains, ridgelines**, foothills and escarpments remain intact and undiminished. In 2031 these features are clearly identifiable in the landscape and retain a **high level of visual, scenic and cultural value**. ...*

(d) *The Sunshine Coast continues to be renowned for the many important views and vistas which contribute to the identity and attractiveness of the region. Local views of importance to residents are recognised and respected.”*

Prominent landscape features (See Table 3.8.2.1 below) ... **important views to these features are to be protected from intrusion from buildings and other aspects of urban development.**

Table 3.8.2.1 Regionally significant landscape features

Landscape features		
Mountains, ridgelines, escarpments and foothills	<ul style="list-style-type: none"> • Blackall Range • Conondale Range • Mooloolah Range • Glass House Mountains • Mount Coolum • Mount Eerwah • Mount Emu 	<ul style="list-style-type: none"> • Mount Mellum • Mount Ninderry • Mount Peregrine • Peachester escarpment • Maleny escarpment • Buderim escarpment
Waterways	<ul style="list-style-type: none"> • Mary River • Maroochy River • Mooloolah River 	<ul style="list-style-type: none"> • Pumicestone Passage • Stanley River
Water bodies	<ul style="list-style-type: none"> • Cooloolabin Dam • Ewen Maddock Dam • Lake Baroon 	<ul style="list-style-type: none"> • Wappa Dam • Lake Weyba
Other landscape elements	<ul style="list-style-type: none"> • Beaches • Parabolic high dunes • Coastal headlands 	<ul style="list-style-type: none"> • Islands, particularly Mudjimba Island and Bribie Island • Ocean.

Mount Coolum, a regionally significant landscape feature, forms a backdrop to the subject site. Views from Mount Coolum, beaches, parabolic high dunes, coastal headlands (Point Arkwright/Lows Lookout) and the ocean, and vistas from Mount Ninderry and the Buderim Escarpment are all regionally significant landscape features and should be protected.

C. VIEWS, VISTAS AND VANTAGE POINTS

This area is seen from many vantage points, not just the key vantage points of Mount Coolum, Point Arkwright, the beach and the ocean but also would be viewed from Mount Ninderry, several lookouts as well as parts of Buderim and the hinterland.

The tops of buildings above 8.5 metres in height will impede on the scenic amenity of Mount Coolum. These buildings accompanied by a massive sea of roofs will dominate site lines not only for the locals who live on the hills and ridges around the site but from atop Mount Coolum, the ocean, the coastal headlands and lookouts.

The proposed small resort site containing a 220 room hotel accompanied by a high-density residential development will significantly impact on the area's scenic amenity. The estate will be visible from key viewpoints and will create a precedent for further over-development of the coastal corridor in conflict with its low-key character.

Construction of approx. 1,000 dwellings on the site will have a detrimental affect on the scenic amenity of the surrounding area. In particular, construction of four, five, six and seven storey buildings that intrude above the tree line will alter forever the vistas that are presently enjoyed from many key vantage points. Local residents and tourists should not be [inflicted] with this intrusion.

This expanse of buildings would draw the eye from the natural beauty of the coastline.

The visual amenity of Yaroomba Beach and its environs, be it from the vantage points of private homes or public viewing locations such as Point Arkwright Headland and Mount Coolum National Park, contribute to the liveability and sense of place for residents. These key vantage points are also an attraction for visitors. In particular, the view from atop Mount Coolum is the one of the most significant natural attractions on the Sunshine Coast. This amenity should not be severely degraded.

In Council's 2015 Staff Report it indicates at page 21, when one of the moderated versions of the then proposal was considered, that if buildings up to 8 storeys were located, such buildings would need to be focused on the centre of the site rather than adjacent to the dune esplanade ...

2. LOCALS VISUAL AMENITY DEGRADED

The Code for Building Heights in the Coolum Local Plan states –

- (c) ***development does not result in a significant loss of amenity for surrounding development, having regard to:-***
 - (i) *the extent and duration of any overshadowing;*
 - (ii) ***privacy and overlooking impacts;***
 - (iii) ***impacts upon views;***
 - (iv) ***building character and appearance; and***
 - (v) ***building massing and scale relative to its surroundings.***

The Coolum Local Plan overall outcomes provides --

7.2.8.3 (2)(k) Development is designed and sited to protect significant ... views either to or from important landscape features

Council must protect important vistas such as the former Hyatt beachside green space and the Yaroomba beachside from intrusive development. The siting of such a prominent development in this area would destroy this outstanding coastal seascape and its inherent scenic beauty for which it is fondly regarded.

The purpose and overall outcomes of the Scenic Amenity Overlay Code states --

- (1) ***The purpose of the Scenic amenity overlay code is to ensure that development does not adversely affect scenic amenity and landscape values within the Sunshine Coast.***
- (2) ***The purpose of the Scenic amenity overlay code will be achieved through the following overall outcomes:-***
 - (a) ***development protects the significant landscape elements and features which contribute to the unique character and identity of the Sunshine Coast, including:- ...***
 - (iv) ***significant views and vistas.***

Significant Views and Vistas			
P06	Assessable development requiring impact assessment, or other development that exceeds the maximum height specified on a Height of Buildings and Structures Overlay Map, does not adversely impact upon significant views. Note—the Height of buildings and structures overlay code provides that certain types of development may exceed the height limits specified for a site on the applicable Height of Buildings and Structures Overlay Map.	A06	Development maintains or enhances the significant views identified in Table 8.2.12.3.2 (Significant views) .

Table 8.2.12.3.2 Significant views include ...

Views from Pt Cartwright	Coolum local plan area
Views from Mt Coolum	Coolum local plan area
Views from Pt Perry (Coolum)	Coolum local plan area
Views from Pt Arkwright	Coolum local plan area
Views of Mt Coolum from David Low Way and Sunshine Motorway	Coolum local plan area, Maroochy North Shore local plan area, Rural area
Views of coastline from David Low Way between Yaroomba and Coolum	Coolum local plan area

Council's 2015 Staff Report also confirms the following viewpoints in the surrounding residential area could be affected –

- Immediately north of Neurum Road
- West of DLW;
- Eurungunder Lane;
- Junction of Warrack Street and Valerie Avenue;
- Wunnunga Crescent;
- Yinneburra Street;
- Toolga Street.

DW believes buildings higher than the tree line and/or a mass of roofs will affect these viewpoints.

3. DW STUDY SHOWS VIEWS FROM VANTAGE POINTS WILL BE DEGRADED

In 2005 Lendlease attempted to gain approval for buildings up to 20.8 metres in height. In a report by Paul Summers, Planner, commissioned by DW in 2005, it states –

... Figure 3 on page 5 shows quite clearly the visual dominance of the building scale in the area. The illustration uses one building only, but there will be multiple buildings involved ...

Figure 4 on page 5 provides a long-section using the applicant's diagram and the approximate height and location of Mt Coolum. Normally vertical exaggeration is used to highlight differences in such diagrams; however here the natural scale has been used. It can be seen that the physical distance between Mt Coolum and the proposed buildings is such as to create a stark contrast between the two.

5

FIGURE 3 DEVELOPMENT SECTIONS



FIGURE 4 MT COOLUM & DEVELOPMENT SECTIONS



And further -

“Buildings of up to 20.8m in this area will have their own prominence and whilst not challenging Mt Coolum’s prominence will draw the eye from the natural focal features...”

Whilst the 3 x 7 storey buildings in this proposal are proposed to be located at the northern end of the site, there are several 4, 5 and 6 storey buildings which will all visually dominate the area and it is reasonable to expect (given the site’s development history) that a future Application to construct additional 7 storey buildings or higher on other parts of the site will be sought at a later date.

4. COUNCIL'S STAFF REPORT REFERS TO PUBLIC VIEWING POINTS

Council's 2015 staff report stated :

*"The Yaroomba site has a **high degree of visibility from a broad array of public viewing points, most significantly, from Point Arkwright and Mount Coolum.** Any development of the site would ideally manage these impacts through the height, location and massing of buildings, to ensure that the landscape is the dominant form when viewed from key public view points. A key issue therefore is the visual impact of any proposed built form and resultant changes to character and identity in the locality."*

5. REGISTER OF NATIONAL ESTATES – MOUNT COOLUM

Listing of Mount Coolum on National Estate Register 1998 (online details): <https://dmzapp17p.ris.environment.gov.au/ahpi/action/search/heritage-search/record/RNE17737> (see extract below) (Additional information from website links): "Protection of places in the Register. The existence of an entry for a place in the RNE does not in itself create a requirement to protect the place under Commonwealth law. Nevertheless, information in the register may continue to be current and may be relevant to statutory decisions about protection. RNE places can be protected under the EPBC Act if they are also included in another Commonwealth statutory heritage list or are owned or leased by the Commonwealth. For example, RNE places owned or leased by the Commonwealth are protected from any action likely to have a significant impact on the environment. In addition, places in the RNE may be protected under appropriate state, territory or local government heritage legislation."

This confirms the significance and uniqueness of Mount Coolum and the importance of protecting it and the area around it from inappropriate development.

D. DENSITY

1. HIGH-RISE, HIGH DENSITY TOTALLY INAPPROPRIATE FOR THE AREA

This development proposal fundamentally conflicts with the density of development planned for the site under the SCPS 2014. The Applicant seeks to develop a high-density residential estate in a location clearly planned for low-density development consistent with the established low-key coastal character of Coolum and Yaroomba.

The proposed density of approx. 1,000 dwellings (in addition to a 220 room hotel) including residential lots of only 200m², grossly exceeds the density of the site's existing approved Master Plan, which allows only a further 315 dwellings. The SCPS 2014 seeks development in line with the density of The Coolum Residences on the adjacent land and the developed character of Yaroomba more broadly. The proposed density represents a significant over-development of the site and cannot be justified.

The approval of DA MCU17/0096 for Stage 1 is dependent on the preliminary approval of the Yaroomba Beach Master Plan (MCU17/0095) contained in the S242 Application.

This Master Plan seeks to vary the effect of the SCPS 2014 from low density residential to very high density residential: the equivalent of approx. 1,163 x 2 bedroom dwellings.

In 2015 when Council voted against SH's request to amend the SCPS 2014, one of the deciding factors was the negative impact high density population would have on the Sunshine Coast.

Further, Council's Information Request questioned the architectural standards of the high density residential proposal. SH has responded to this question by decreasing the actual number of dwellings but these dwellings **still equate to approx. 1,163 x 2 bedroom apartments**. They have not decreased the population impact of the proposal.

The proposed building heights should only be supportable in primary centres identified under the SCPS 2014, such as Mooloolaba and Maroochydore.

2. THE DENSITY OF DWELLINGS IS NOT REQUIRED

The Strategic Intent in the SCPS 2014 outlines the expectations about where growth will occur.

In 3.2.1 it states that –

*In 2031, the Sunshine Coast is renowned for its **vibrant economy, ecological values, unique character and strong sense of community....***

*The **majority of new growth is located in the Sunshine Coast Enterprise Corridor, within and surrounding the mixed use regional activity centres of Maroochydore, Caloundra, Kawana and Sippy Downs and in the emerging communities of Palmview, Kawana Waters and Caloundra South. Significant new growth is also located in Nambour as the dominant major regional activity centre serving hinterland areas.***

It is clear that the SCPS 2014 never envisaged Yaroomba as a major new growth/development area or as a priority investment area.

E. TRAFFIC

DW has reviewed the Traffic Report submitted by SH, and identified significant deficiencies and issues of concern. DW believes traffic will exceed the road capacity.

DW's Traffic Study Report is attached (**APPENDIX A**)

1. THE SH TRAFFIC REPORT UNDER-ESTIMATES INCREASED TRAFFIC

A. *BASE CASE TRAFFIC VOLUMES UNDER-ESTIMATED*

The SH Traffic Report indicates that the base line traffic survey was conducted on a week day mid-winter between 7 and 9 am on David Low Way and Beach Road.

Clearly mid-winter traffic is lighter than the traffic in other seasons. Also the traffic on Beach Rd at the Coolum School should have been surveyed at the afternoon peak.

B. *TRAFFIC GENERATED BY THE PROPOSED DEVELOPMENT HAS BEEN UNDERESTIMATED*

The SH Traffic Report underestimates the number of dwellings and fails to include the increased traffic associated with the proposed retail and commercial components of their proposed development resulting in a significant underestimation of the traffic likely to be generated.

2. THE CONCLUSIONS ARE UNSUPPORTED BY THE DATA

The conclusions reached in the SH Traffic report and described in Table 1 Section 5 are unsupported by data in the body of the report.

It seems reasonable to conclude that the traffic network in the vicinity of the proposed large and dense residential development proposed by SH was not designed to accommodate such a dense project. The local road network will simply not be able to adequately accommodate the traffic anticipated by 2027.

3. NO SOLUTION TO INCREASED TRAFFIC AT MAJOR INTERSECTIONS

A. DAVID LOW WAY (DLW) AND BEACH ROAD

As can be seen from **APPENDIX A**, the intersection at DLW and Beach Road is not able to be upgraded so as to cope with the traffic impact of this Development Application. This is confirmed in Council's 2015 staff report (page 19) where it states:

... The Department .of Transport and Main Roads have ... raised concerns that the upgrade of the Beach Road / David Low Way intersection may not be practical to implement.

This intersection can barely cope with the current traffic and does not cope well with the increased traffic during school holidays.

David Low Way from Point Perry to Coolum cannot be widened without extensive resumption of land on the west side (all developed property). There is no land available on the beachside to achieve a widening.

The SH Traffic Report suggests resuming the beachside street parking on the south east side of DLW in order to widen the road at or near the intersection. This would cause significant parking problems for beachgoers and for casual customers of the restaurants on the west side of the intersection and would meet strong community opposition.

DW estimates significant "queues" in all directions would result from the significant increase in traffic even with the suggested very limited widening.

SH has not provided an adequate solution for this intersection.

B. COOLUM SCHOOL INTERSECTION – BEACH, SCHOOL AND SOUTH COOLUM RDS

SH has proposed significant widening of the roads at this intersection and the installation of signals. Widening the road would require resumption of developed land including residential and commercial property.

Very significant costs are involved in implementing such an upgrade. SH has not indicated the source of funds for such major reconstruction of this intersection. There was no offer by Sekisui to meet all or part of the costs.

The proposed solution does not appear to be a viable or achievable solution to the traffic problem.

4. TRAFFIC LOG JAMS

A. *THE ENTRANCE TO THE SITE*

Only one entrance/exit from the site is envisaged. This will be another roundabout on DLW. All the vehicles on site will enter and exit through this roundabout. That includes:

- Residents vehicles
- Around 1800 vehicles from the residential dwellings (assuming one car per bedroom),
- Around 2-400 vehicles from the serviced apartments
- An estimated 50 vehicles from the 220 room hotel;
- Staff vehicles – servicing the hotel and the serviced apartments
- Supplier vehicles
- Conference attendees
- Vehicles coming to the retail area
- Vehicles for the commercial area
- Construction vehicles
- Construction machinery and trucks
- Worker's vehicles

This suggests that the entrance/exit and the DLW will be log jammed at peak times.

B. *LONG TERM SOLUTION FOR SCHOOL INTERSECTION NEEDED NOW*

The intersection of School Road, South Coolum Road and Yandina-Coolum Rd is already a major congestion area. It would not cope with any additional traffic. Traffic often is banked back for up to a kilometre from School Road back to David Low Way. The intersection at school opening and closing times is a frenzy of activity with children running or riding this way and that and the traffic banked up in all directions.

Any further increase in traffic could result in blockages at the Coolum exit of the Sunshine Motorway – causing further traffic mayhem.

5. PARKING PROBLEMS IN AND AROUND COOLUM

Parking is already difficult in Coolum. It is almost impossible to obtain a car parking spot on the street on the Esplanade and the Tickle Park car park fills quickly especially during summer.

Similarly the shopping precinct car park is very busy and it is increasingly difficult to find a car park.

Adding the additional vehicles from the proposed development coming into Coolum to shop or eat/drink can only exacerbate the existing problem.

Council's response has been, amongst other things, to foster the use of public transport. However, until the public transport network covers more of the area, the service is more frequent and faster most people will continue to choose to travel in their vehicle.

The proposed intensive development will cause significant and apparently insurmountable traffic problems and exacerbate the existing parking problems in and around Coolum.

F. SIGNIFICANT IMPACTS ON TURTLES

1. MARINE TURTLES (ENDANGERED SPECIES)

The visual space, and the irreversible environmental impact caused by light pollution (light spill) from 7 storey building heights and the glow from intense development would impact on the nesting habitat of endangered nesting loggerhead turtles and threatened green turtles. Turtle friendly lighting is not applicable to Australian stocks of turtles. The irreversible effect of light pollution from high-rise development is forever in place and has in-turn destroyed endangered and threatened sea turtle nesting habitat in the section of beach from the intersection of Coolumbina Rd & David Low Way south to Point Perry, and then in areas including Mooloolaba and Maroochydore. The continual destruction of protected animal habitat in Queensland is unacceptable. There is ample research to back up this claim

This proposed development would significantly disrupt breeding and hatchling behaviour of the area's endangered Loggerhead and vulnerable Green Turtles, regardless of the proposed 'safeguards' in lighting etc, in the Application, through the sheer density of use of what is currently a low-key, unspoiled beach.

We note it was the developer's responsibility to invoke the provisions of the EPBC Act, as a result of threat to endangered species. SH has not done so. DW considers this omission to be reportable.

Endangered marine turtles nest in the coastal dunal areas. The influx of 2000 to 3000 additional people and the glow from the lighting and the acoustic affects of an additional 2,000 odd vehicles and events close to the dunes, will adversely impact on these endangered species.

2. COUNCIL'S STAFF REPORT REFERS TO IMPACT ON TURTLES

In Council's conclusion to the previously proposed Planning Scheme Amendment it stated:

*Given the location of the subject site, impacts on the environment would need to be managed sensitively. In particular, **development has the potential to impact on the known turtle nesting areas with the adjacent coastal dune reserve and beach.***

G. COMMUNITY ENGAGEMENT FLAWED

SH conducted the following community engagement –

- ❖ *Five Discussion Groups*
- ❖ *Website presentation* and feedback via survey form
- ❖ *Listening Post* – held at Mount Coolum

1. DISCUSSION GROUP FLAWS

- Stakeholder List strongly favoured development industry and did not include the local indigenous people the Gubbi Gubbi
- We understand several participants were current or former employees of SH
- Invitation to 5 half day Discussion Groups received 10 days before commencement, with 4 days to RSVP. (DW already had an appointment to meet with SH on a one-on-one basis but that was cancelled). Stipulated all Discussion Groups had to be attended and that attendee was not transferrable – same person had to attend all.
- On 15 May 2016 DW declined to attend the Discussion Groups stating (amongst other things):

“Once Sekisui has developed new concepts for the site, Development Watch will be pleased to engage with you and consult on those proposals.”
- Despite DW’s non-attendance at the Discussion Groups, SH advised other opportunities would arise but these did not materialise

Post Discussion Groups, DW invited SH on several occasions to attend consultation with a range of community stakeholders Sekisui House refused despite their earlier commitment to do so.

2. WEBSITE/LISTENING POST FLAWS

- Some artist’s impressions not to scale.
- various DW members and other community members reported that visual display at the time they visited was misleading as it did not include the three 7 storey towers or the intensive residential component
- Staff were unable to answer key questions about the proposed development eg. the number of dwellings

3. THE SURVEY WAS BIASED

Survey form contained questions worded in order for developer to obtain the answers it desired and did not address controversial issues such as height and density and did not refer to the intense residential component. The Survey is at **APPENDIX B**.

4. THE CLAIMED SUPPORT FOR SH'S PROPOSAL LIKELY TO BE OVERSTATED

We note with interest that many of the letters of support included in their Community Engagement Strategy Report are from the development industry. However many DW and other community members provided feedback following the Listening Post or about the SH website but these are not included.

5. COUNCIL SHOULD OBTAIN EXPERT ADVICE

DW recommends Council obtain an independent report from an appropriately qualified expert on the overall community engagement process used by SH, their analysis and the veracity of the conclusions SH reached.

Similarly, a report reviewing SH's Survey Form and SH's analysis and conclusions from an appropriately qualified expert should be commissioned by Council.

6. CONSULTATION WITH LOCAL INDIGENOUS PEOPLE NOT BEST PRACTICE

Apart from the local indigenous people not being invited to SH's Discussion Groups, best practice would have seen SH having met the seven elected representatives of the Kabi Kabi First Nation group a number of times (instead of just one meeting) to undertake a comprehensive and updated cultural heritage assessment, and to develop a new or update the current cultural heritage management plan under the guidelines of the QG Aboriginal Cultural Heritage Act 2003.

H. ENVIRONMENTAL

1. DUNES

A. *FRONTAL HIGH DUNES*

Frontal high dunes are considered to be significant landscape features under the SCPS 2014.

As at 2005 there was one access point from the former Hyatt property to the beach through State owned land.

Since then an additional access point has been allowed, through primarily vegetated beachfront sand dunes.

Additional access tracks should not be approved.

B. *PARABOLIC DUNES*

The parabolic dune at Yaroomba is cited in the SCPS 2014 as a significant landscape feature and should be protected.

With climate change and rising sea levels, dunal integrity is paramount. The dunal system and the vegetation it supports is essential to the stability of the coastline and is inter-related to the surrounding flora, topographical formation and geology of this unique area.

This proposal would degrade the frontal and parabolic dunal systems. A 220 room hotel and approx. 1,000 dwellings would result in an approximate number of persons on this site of 3,000. The population of Yaroomba is currently approximately 1600.

The dunal systems would not cope with such an influx of people.

C. *CONCERNS RAISED IN 2015 ASSESSMENT*

Council's 2015 staff report at page 15 states ...

...The key issue of consideration relates more to edge effects and impacts given the significance of adjoining environmental values be they in the Yaroomba Parabolic Dune to the north or the esplanade and dunes to the east of the site both of which contain

significant environmental values and provide regional connectivity for habitat. These values will need to be managed sensitively as they in turn contribute to the broader natural advantage of the Sunshine Coast.

Further, at page 20, it provides

Environmental Aspects

Although the site has been previously approved for development and is not seen to contain high quality ecological assets, there are concerns about impacts on the surrounding land, particularly the dune areas adjacent to the site, which are of very high conservation significance.

D. SITING OF HOTEL NEAR DUNAL AREAS

At page 21 of Council's 2015 Staff Report, it states –

*It is likely that extensive engineered foundation works will be required ... to support the height and scale of buildings ... and underground carparking areas. This **presents groundwater impact risks and subsequent possible impacts on vegetation of the dune system unless adequately addressed and managed.** The protection of the eastern dune is imperative for a buffer against storm tide inundation for the site. **Long term impacts of climate change on the dune areas would need to be understood to inform the design of buildings and infrastructure on-site.***

I. PRECEDENTS WOULD BE SET

1. INTEGRITY OF SCPS 2014 UNDER THREAT

The application threatens the integrity of the planning process on the Sunshine Coast. Approval of the development would set a dangerous precedent because it would:

- Fundamentally conflict with the provisions of SCPS 2014;
- Be without sufficient reasons to overcome the conflicts with the SCPS 2014 or the impacts the development would introduce;
- Encourage further applications for development at odds with the SCPS 2014 and policies;
- Cause future inconsistent proposals to become harder to resist due to compromised planning decisions and the resultant unplanned development outcomes.

Notably the site is adjacent the Palmer Coolum resort, which now sits idle. It would be reasonable to expect the intensity of development approved on the subject site would also be sought on that land. If Council finds reasons to support the current development it would be difficult to oppose a similar style of intensive development on the Palmer Coolum site or other out-of-centre areas of the Sunshine Coast.

The proposed small resort site containing a 220 room hotel accompanied by a high-density residential development will significantly impact on the area's scenic amenity. The estate will be visible from key viewpoints and will create a precedent for further over-development of the coastal corridor in conflict with its low-key character.

Further, should an approval for one 7 storey building be granted, it is reasonable to expect that further buildings of 7 storeys and higher will be applied for this site at a later date.

2. THREAT OF PRECEDENT CONFIRMED

At pages 19-20 of Council's 2015 Staff Report it states –

*In the longer term, the proposed development, on account of its **land use intensity, building height, building bulk and location**, may set a new expectation for building heights in the coastal area between the Maroochy River and Coolum (if it were to be realised) and greater pressure for land use change in the area, in favour of more intensive development.*

And at page 22 –

... this development scenario could also set expectations for increased building heights in the locality...

J. PUBLIC NOTIFICATION INADEQUATE

1. SIMPLE ADMINISTRATIVE ERROR BUT SIGNIFICANT CONSEQUENCES

A simple administrative omission by the Applicant resulted in the restart of the public notification. Many residents had made a submission. These were deemed by Council to be “not properly made”. DW disputes the interpretation of the relevant section of the SPA as follows:

s306 of the Sustainable Planning Act 2009 (Qld) provides, so far as is presently material:

“306 Submissions made during notification period effective for later notification period

(1) This section applies if—

(a) a person makes a submission under section 305(1) and the submission is a properly made submission or the assessment manager accepts the submission under section 305(3); and

(b) the notification stage for the application is repeated for any reason.

(2) The properly made submission is taken to be a properly made submission for the later notification period and the submitter may, by written notice—

(a) amend the submission during the later notification period; or

(b) withdraw the submission at any time before a decision about the application is made.” [emphasis added]

The advice we have received is that this section would operate in the present circumstances, where it has become necessary to repeat the notification stage with the result that submissions earlier lodged are taken to be properly made submissions for the later notification period.

Should a Court case ensue, DW will be arguing that all submissions lodged during the first and subsequent notification period should be deemed properly made submissions for the purposes of an Appeal.

2. PUBLIC NOTIFICATION SIGNAGE

DW would like it noted that there was very little detail on the Public Notice sign regarding the major part of the proposal, ie. the residential component.

K. TOURISM

1. TOURISM FOCUS OR RESIDENTIAL WITH AN ADD-ON HOTEL

The SCPS 2014 specifically identifies the subject site as a Coastal Tourism Focus Area which is intended to accommodate a **concentration of visitor accommodation and related tourism services**.

The current concept proposes a five-star hotel of 220 rooms, approx. 1,000 residential dwellings, as well as a retail component, conference facilities, a lake and a small park. It is not designed to accommodate a concentration of visitor accommodation and tourism services but rather is a concentrated residential development with a small tourism focus. (See Map below showing SH's Tourism Focus --



2. THE EXPECTATIONS FOR A TOURISM FOCUS AREA ARE NOT MET

SH have stated their site is in a Tourism Focus Area. See map SFM2 below. The stars on this map indicate the 22 Tourism Focus Areas on the Sunshine Coast. See also on the following page an extract from SFM2 showing the star which indicates Yaroomba is a Tourism Focus Area.

In the **Strategic Framework 3.2.2** it states –

*“...The region offers an **enviable lifestyle and environment**, and has a **natural competitive advantage**”...*

*“... **Tourism focus areas provide for growth, investment and delivery of unique tourism experiences***

Even though this site sits within a Tourism Focus Area, this proposal is not focused on tourism but is substantially a residential development with a very small tourism component.

This proposal does not have any unique aspects from a tourism point of view. The five star 7 storey hotel proposed is more akin to a Hotel that would be planned for the Maroochydore CBD.

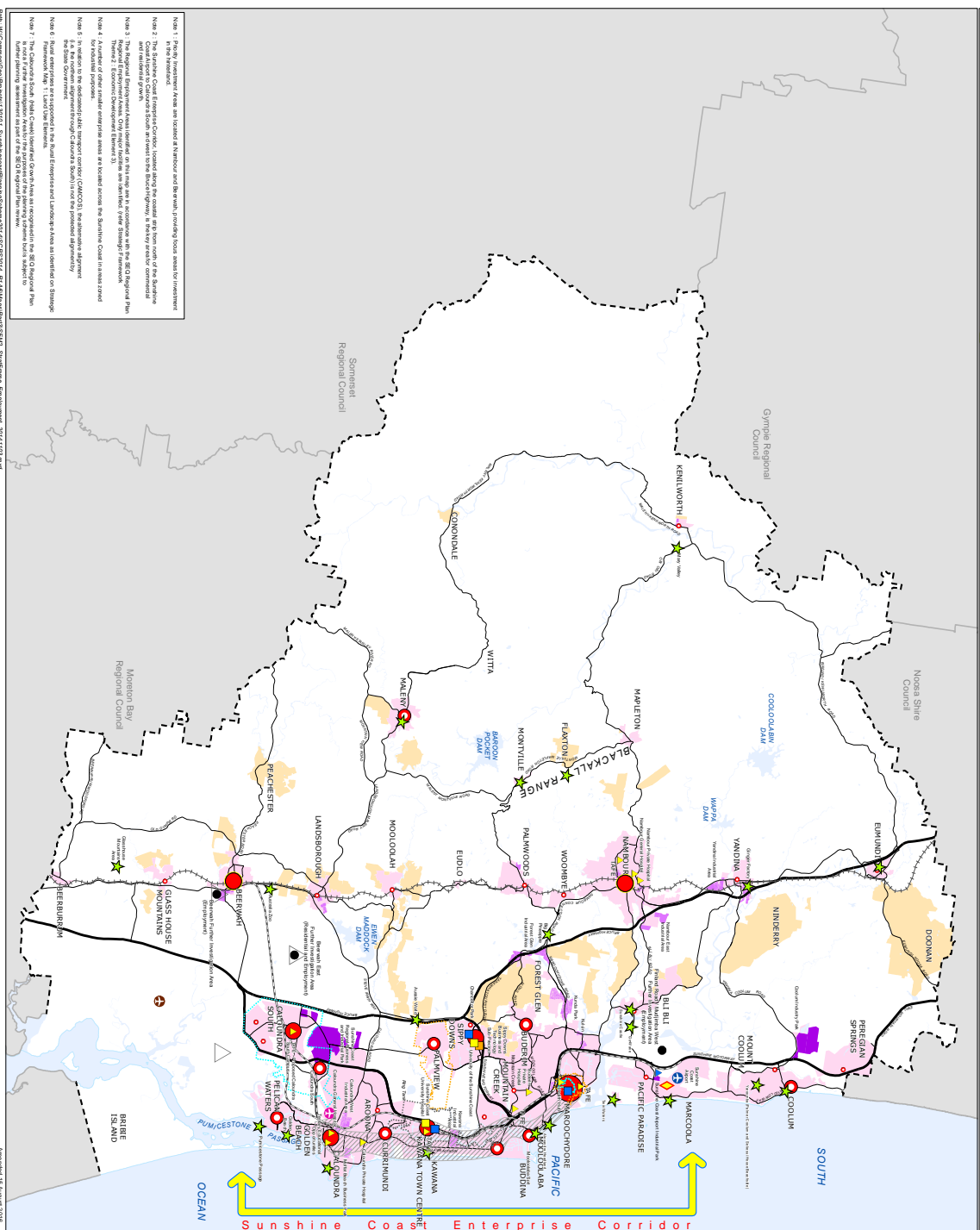
This area should boast a unique low rise, low key eco-lux resort across the entire 19ha site (or a substantial percentage thereof). Such a prestigious resort could complement the former Hyatt Regency Coolum as a more family orientated tourist resort (once it is resurrected). That would be a unique and superior outcome for tourism for the Sunshine Coast.

This proposal does not set this site apart from its main competitor ie. the Gold Coast. There would be no **natural competitive advantage** to be gained at all. Just more of the same high density, high rise development.

*... **Natural coastal foreshores attract residents and visitors for the environmental, scenic amenity and recreational opportunities that they provide.***

What will attract visitors to this Tourism Focus Area would be **Yaroomba’s unique natural competitive advantage** eg. a to stroll to the end of the beach where you can stand on Point Arkwright to look back at an unimpeded stunning view; to view marine turtles and whales from Point Arkwright headland; to continue the journey along the cliff faces, past the bays and into Coolum; or to ascend Mount Coolum and be rewarded with a stunning view of an area predominantly green and low-key.

For this reason, a world’s best practice, low-rise, low-key eco-lux resort across the entire 19ha site would create a unique tourism opportunity for the Sunshine Coast and could complement a resurrected Hyatt Regency Coolum resort.



Strategic Framework Map 2 Economic Development Elements

- Land Use Categories**

 - Urban Area
 - Rural Residential Area

Activity Centric Network

 - Principal Regional Activity Centre
 - Major Regional Activity Centre
 - District Activity Centre
 - Local (Full Service) Activity Centre
 - Specialized Regional Activity Centre - Sausalito Coast
 - Priority Investment Areas

Employment, Industry and Enterprise Areas

 - Regional Employment Area
 - Regional Employment Area (Science and Technology)
 - Regional Employment Area (Aerospace)
 - Regional Employment Area (Health, Education and Training)
 - Other Employment Area

Major Transport Elements

 - North Coast Rail Line (Subject to ongoing investigations)
 - Domestic Public Transit Corridor - CA/MCOs
 - Montgomery to Colma and a Priority Transit Corridor
 - San Francisco Coast Airport
 - Gateway to Marin

Other Elements

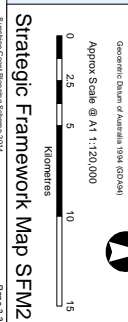
 - Local Government Area Boundary
 - District Master Planned Area (see Part 10 - Other Plans)
 - Land Use Development Control Plan 1 - Kawana Waters which (see Section 1.5 - Planning Scheme Components)
 - Priority Development Areas (subject to the Economic Development AD 2012)
 - SEA Regional Plan identified Growth Areas
 - Ocean, Waterways and Wetlands

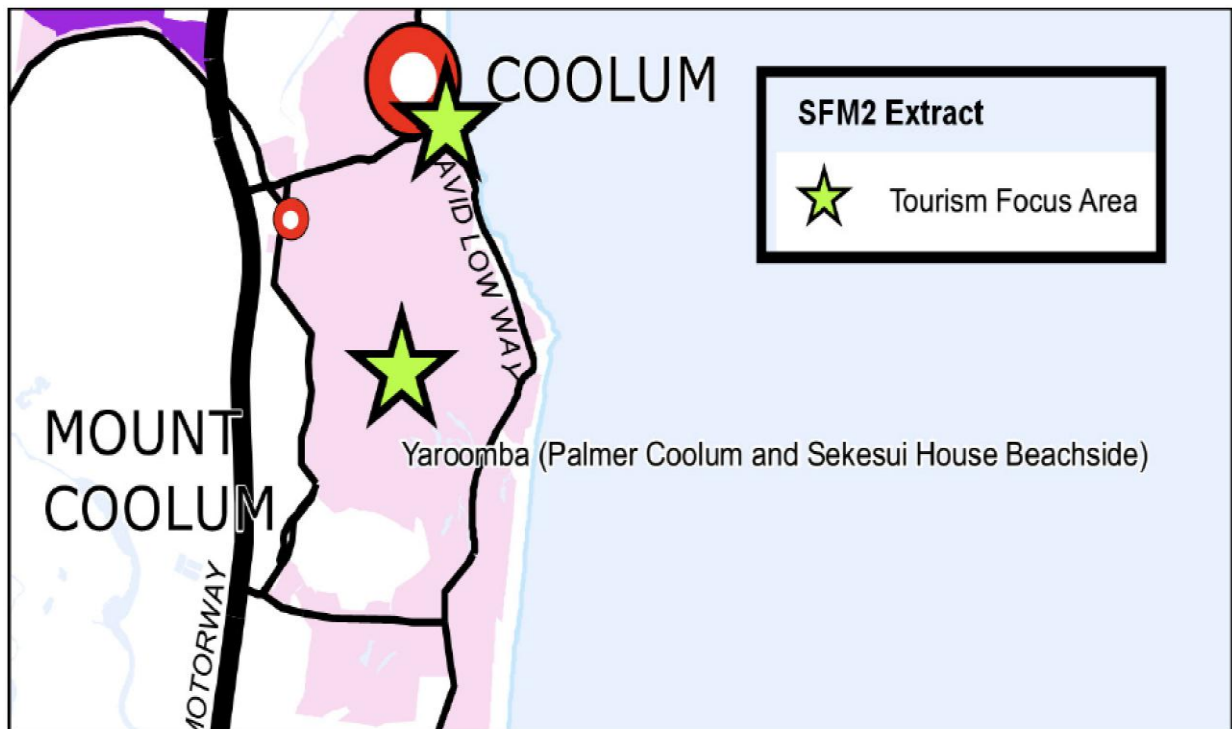
The *Journal* is pleased to have published a special advertisement of the Economic Development Centre at a conceptual level and is not intended to be interpreted at the calendar level.

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3. SH PROPOSAL HAS ECO-TOURISM ACCREDITATION?

SH have stated their 7 storey hotel is an eco-tourism resort.

Relevant extracts from The International EcoTourism Society indicates the expectations include:

- Ecotourism **sustains the well-being of the local people...**(TIES, 2015) [L]^[SEP] is **uniting conservation, communities ...**

Some of their principles are :

- **Minimize ... social ... and psychological impacts** [L]^[SEP]
- **Build environmental and cultural awareness and respect** [L]^[SEP]
- **Design, construct and operate low-impact facilities** [L]^[SEP]
- **Recognize the rights and spiritual beliefs of the Indigenous people ...** [L]^[SEP]

It is our view that SH's proposal does not align with the eco-tourism principles or expectations. [L]^[SEP]

4. THE STATE'S INTEREST IN TOURISM

This proposal does not align the State Planning Policy for Tourism.

Extracts from the applicable SPP/SPP Guideline for Tourism are –

State interest—tourism

*“Tourism planning and development opportunities that **are appropriate and sustainable are supported; and the social, cultural and natural values underpinning the tourism developments are protected** to maximise economic growth.”*

Making or amending a planning scheme ...

The planning scheme is to appropriately integrate the state interest by:

- (1) considering the findings of tourism studies and plans that have been prepared by the state for the local and/or regional area, and*
- (2) identifying and protecting opportunities, localities or areas appropriate for tourism development, both existing and potential, and*
- (3) facilitating and streamlining the delivery of sustainable tourism development that:*
 - (a) **is complementary to and compatible with other land uses, and***
 - (b) **promotes the protection or enhancement of the character, landscape and visual amenity, and the economic, social, cultural and environmental values of the natural and built assets associated with the tourism development, and***
- (4) planning for **appropriate infrastructure and services to support and enable tourism development.***

Appropriate and sustainable tourism development

*Tourism developments can bring a number of economic, environmental and social benefits to their local community, region and wider area. **Appropriate and sustainable tourism development** contributes to the economic viability of places and people through employment and investment, while **not detracting from the natural, social and cultural values that drew tourists there in the first place. Appropriate and sustainable tourism development can complement and enhance the built and natural environment and can play an important role in increasing knowledge and appreciation of the broader ongoing management of the environmental and natural resources that contribute to the tourist experience.***

Tourism encompasses a diverse range of development types and sizes and can exist within a range of land use settings, places and locations—not just within urban areas. It should not be precluded from sensitive or rural areas which they are typically associated with.

Tourism development is not a ‘one size fits all’ and nor is it a ‘free for all’ where any type of tourism development can go anywhere. Tourism development must be sustainable and appropriate to the local context and character of a place. Planning schemes should include development assessment mechanisms that allow local governments to respond in a positive manner to tourism development proposals.

And further:

“Queensland is one of the most biologically diverse places on earth, and is home to a **complex and diverse coastal environment, outstanding natural values and heritage of world, national, state and local significance.**

Biodiversity, including the plants and animals and the ecosystems of which they are a part, is fundamental in achieving healthy and liveable communities ...

The natural environment is essential for our existence and is inherently valuable in its own right. It also underpins many parts of our economy including tourism, mining and the agricultural sector.

Industry, particularly tourism, depends on maintaining world-class and accessible natural areas ...

Planning has a critical role to play in supporting the protection of our environment and heritage for current and future generations, while enhancing the sustainability and liveability of our state. Sustainable planning will balance the conservation of important environmental and cultural values (including Aboriginal and Torres Strait Islander cultural heritage) with economic growth, job creation and social wellbeing.

5. DEGRADES WHAT RESIDENTS AND VISITORS VALUE ABOUT THE COAST

A. IS IN STARK CONTRAST TO “NATURALLY REFRESHING”

Visit Sunshine Coast (VSS), the tourism body funded by the local Councils on the Sunshine Coast, promotes the Sunshine Coast as “naturally refreshing”. This proposal is totally contradictory with and to the advertising campaign that the Council and tourism operators are funding.

DW does not believe this proposal aligns with the theme of “naturally refreshing”.

The 2015 Council Staff Report made the same point:

A key component to the attractiveness of the Sunshine Coast as a tourism destination is its 'natural advantage' which is its point of difference to other regions in South East Queensland and elsewhere. Any proposal to develop large scale international tourist hotels and facilities should also have regard to this branding and image aspect. Indeed, the predominant form of coastal development north of the Maroochy River is characterised by development that is subservient to the natural landscape in which it is located. This has been based on a long held and consistently applied planning policy.

VSS promotes the wonderful views from atop Mount Coolum on its website. Some extracts are as follows –

“MT COOLUM ...an iconic Coast landmark ... with an estimated 50,000 locals and visitors ... each year”

“... a grand volcanic dome that presides over the landscape”

VISITORS' COMMENTS:

“This was what we were wanting. An amazing view - from all directions”

“Breathtaking, beautiful, a true natural wonder”

This is how Visit Sunshine Coast promotes Mount Coolum

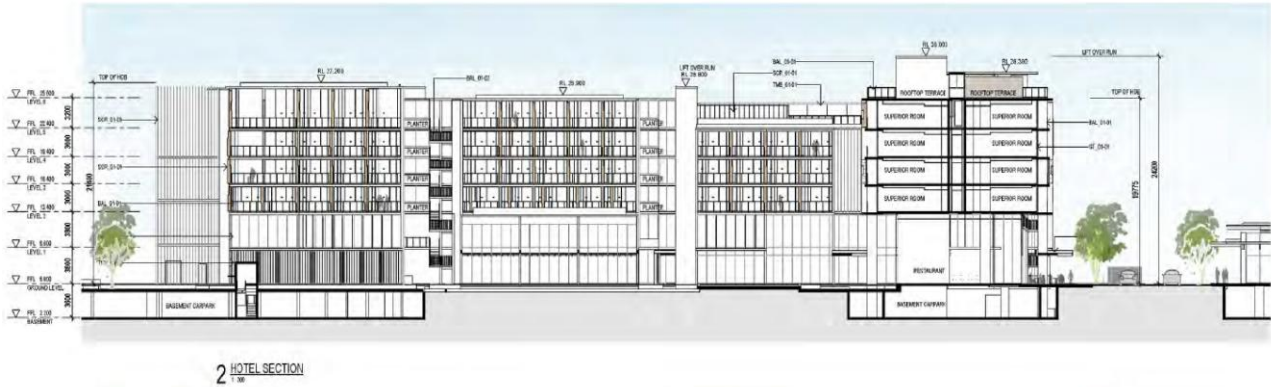
“Glorious from the top!”



**“THE POPULAR MT COOLUM WALK, WITH GLORIOUS VIEWS
FROM THE SUMMIT!”** [Taken from a link on VSS’s website]

DW contends buildings of this size and height in a dense development are not “naturally refreshing”

(Disclaimer. These have been reduced in size for the purposes of this document, so scale may not be exact).



6. NO DIFFERENTIATION FROM “OTHER PARTS OF SE QLD”

If we keep developing “more of the same”, there will be no point of difference for the Sunshine Coast to that of the Gold Coast”, its main competitor.

Throughout the SCPS 2014, reference is often made to the Sunshine Coast’s “natural competitive advantage”. This proposal will not align with the Sunshine Coast’s natural competitive advantage.

Yaroomba is the only remaining prime beachfront site of significant size in the Sunshine Coast Council region. If this site were not developed in a unique way for tourism, there would be a lost opportunity that would never be able to be re-gained.

This proposal will not differentiate the Sunshine Coast from other parts of SEQ.

L. ECONOMIC BENEFIT

1. ECONOMIC BENEFIT ANALYSIS FLAWED

The Applicant proposes to construct approx. 1,000 dwellings in various types of accommodation together with a 220 room hotel in stages over a 10-12 year period.

The applicant argues that substantial economic benefits will flow to the SC from the hotel development through increased tourism, permanent jobs in hospitality, ground and building maintenance and temporary jobs in construction and their flow-on effects . Economic benefits from the construction of over 1000 dwellings result from employment, supply of materials and their flow on effects.

The Sunshine Coast Environment Council (SCEC) has reviewed the applicant's claims of substantial economic benefit.

DW supports the views expressed in the SCEC report and the conclusions reached. A summary is included here and the report is attached at **APPENDIX C**.

2. ECONOMIC BENEFITS RESULTING FROM THE 5* HOTEL

The 2015 Council staff report concluded that the proposed SH amendments should not proceed. In reaching that conclusion the report notes:

...the review of this proposal had reconfirmed the importance of attracting new premium hotel investment.....

...the investigations of the Yaroomba Beachside site highlight the importance of attracting development which is compatible with the site.....

.....It is considered appropriate to initiate an investigation of the opportunities that currently exist to accommodate premium hotel infrastructure and facilities.....⁵

SC Council identified the new Maroochydore CBD as a suitable site for a “premium hotel” with convention facilities and no height limit⁶. The website indicates there will be a staged tender process. The site was last updated in December 2017.

⁵SCRegional Council – 27 April 2015-Special Meeting – Agenda Paper – Consideration of proposed Planning Scheme Amendments – p20

⁶ <https://invest.sunshinecoast.qld.gov.au/Investment-Opportunities/Maroochydore-City-Centre> -viewed 14/01/2018

As the Maroochydore CBD is progressing well, the Council is likely to proceed with the tender process for a premium hotel and convention centre soon.

The implications of this are not considered in the SH economic analysis despite their significance:

- It negates the SH position that there is an urgent need for the hotel on the Yaroomba site.
- It is likely there would be a significant impact on the patronage of the proposed SH hotel and convention facilities when the Maroochydore CBD hotel is built estimated at 50%. This level of loss of patronage could result in the SH hotel being unviable.
- The failure to include this fact in the SH economic analysis is a serious flaw.
- The benefits claimed by SH for the hotel are overvalued and may not be relevant at all if they are seen as simply a “transfer of opportunity” . .

3. ECONOMIC BENEFITS OF OVER 1,000 DWELLINGS ARE VERY LIMITED

Council considered a similar proposal for a hotel and around 1000 dwellings in 2015 as part of the attempt by SH to have the SCPS 2014 substantially amended.

The Council 2015 Staff Report concluded that the proposed development was inappropriate for the site and recommended no amendments to the SCPS be made.

In relation to the economic benefits of the intense residential component the Council Report indicated that:

- Given the number and nature of the dwellings to be constructed it would take up to 24 years to complete the staged development.
- The increased time to completion means there would be fewer jobs (and less economic benefit)

The Council Report noted *“the proposal could divert apartment/unit development away from other centres ” and... “ there is only a limited market for unit and apartment development on the coast.”*⁷

It is clear that the economic benefits that would flow from the proposed residential development would also flow from appropriate development in suitably planned areas.

That is, there is **no need** for such an intensive residential development on this sensitive site. In fact, as outlined in the section on the viability of the hotel, research indicates that, contrary to the SH argument, such intensive residential development on site would impact negatively on the hotel’s viability.

⁷ SCRegional Council – 27 April 2015-Special Meeting – Agenda Paper – Consideration of proposed Planning Scheme Amendments – p20

The fact that the Maroochy CBD will include a “premium” hotel with convention facilities and the detrimental effects of intensive residential development indicates **there is no pressing need for either component.**

4. NO SUPPORT UNDER THE STRATEGIC FRAMEWORK

In **Economic Development – Theme 2 of the Strategic Framework**, one of the key concepts is

- (9) ***Competitive and attractive tourism focus areas and other tourism activities which offer unique experiences, facilities and accommodation types and support major events.***

The Applicant strongly suggests the hotel component aligns with Council's economic development goals but there is almost no explicit support for development of this nature under both the SCPS 2014's Theme 2 – *Economic Development* or Council's *Economic Development Strategy 2013-2033*.

Whilst the application purports to deliver a mixed-use development with a tourism focus, the development yield figures clearly show the hotel is only a minor component of a high-density residential development. The 220 room hotel represents just 6.6% or a 1/15th of the proposed residential yield. The minor tourism component is proposed to justify the gross over development of the site but the Application cannot be considered to be a tourism-focused development in line with expectations under the SCPS 2014.

The hotel's setting within a high-density residential estate is not the style of resort sought for Yaroomba and would likely compromise its function, role in the local tourism sector and its viability.

One of the specific outcomes sought under this Theme is in relation to business and employment activities is –

acknowledge, protect and draw upon the character, lifestyle and environment attributes of the Sunshine Coast which underpin its natural (competitive) advantage.

5. ECONOMIC IMPACT ON RESIDENTS

A. A TRANSFER OF WEALTH FROM SC CITIZENS TO A DEVELOPER

This proposal, in our view, is likely to have a negative effect on property values, particularly on houses with snapshot views on the hills and ridges in the immediate areas.

Whilst DW understands a developer's commercial viability is not to be taken into account when Council decides on a Development Application, the Yaroomba community would, however, be at pains to understand why there should be a transfer of wealth from the residents to a developer.

Similarly, other developers have constructed units in the area and they too would be wondering why a particular developer should be able to profit substantially more by overriding the SCPS 2014.

6. CONCLUSION

A low-rise, low-key eco-lux resort across the entire 19ha site would result in greater economic benefit not only for the Sunshine Coast tourism industry but also for Yaroomba and the Coolum area. The type of employment opportunities would be similar in number to that of SH's proposal. However, the spin-off benefits for Coolum and the Sunshine Coast would be far greater than a 5 star hotel amidst a construction site for up to 9 years.

Refer also to Viability of Resorts ..

M. VIABILITY OF HOTEL/RESORTS

1. VIABILITY OF THE HOTEL IS RELEVANT

The proposed hotel is a relatively small component of the proposed intense residential development. Normally the commercial viability of a Development Application is not a relevant consideration in the decision making process. However, it is relevant in this particular circumstance because:

- a) the site is prime natural beachfront which is designated a tourism focus area in the SCPS;
- b) Most of the SH advertising has been about the hotel;
- c) Many of those supporting the proposal are supporters of a hotel and are unaware of the extent and intensity of the residential component;
- d) The hotel is the main focus for the business community;
- e) Most importantly the applicant has indicated that the viability of the hotel component is dependent on the proposed extensive residential component.

2. VIABILITY OF EXISTING RESORT

The Hyatt Regency Coolum was a five-star resort of international stature. Apart from attracting high-profile individuals, its conference facilities were used for international inter-government meetings. The former Hyatt was selected as a suitable venue for the APEC Finance Ministers Meeting in July/August 2007. This meeting and CHOGM in 2002 are examples of the value, to both Australia and the State, of the former Hyatt being an appropriate and secure venue. In addition, its 18-hole golf course was considered one of the top resort golf courses in the country and was host to the internationally popular Australian PGA championship tournament.

The continued viability of resorts of this nature are surely of vital economic interest to all levels of Government.

It is DW's hope that the Palmer Coolum Resort will be resurrected by an interested buyer at some stage in the future.

The development proposal by SH on the beachside does not even go near the prestige of the former Hyatt. In fact, DW believes the Hotel proposed by SH will fail.

Back in 2005 Lend Lease's argument in favour of developing the beachside was the notion that the Hyatt Resort was not profitable and would fail unless restored to profitability by making it subservient to extensive residential development.

Here is a précis of the history of the site from when Hyatt was first constructed. This shows a clear pattern emerging :

- ✧ **Prestigious Hyatt built mid to late 1980s – successful for 15 to 20 years**
- ✧ **Lend Lease is not a long term owner of resort or tourism assets. It did, however, purchase the Hyatt Regency Cooloom in 2003.**
- ✧ **Lend Lease were given approval to remove 6 prestigious golf holes from the beachside to develop for residential**
- ✧ **Lend Lease partly developed the beachside and then onsold to SH in 2010.**
- ✧ **SH is not a long term owner of resort or tourism assets (as was the case with Lend Lease). It's main area of focus is residential.**
- ✧ **SH attempted to gain approval for an Amendment to the SCPS 2014 in 2015 but council rejected it.**
- ✧ **SH have now lodged this DA to override the SCPS 2014.**

When Lend Lease sought approval for the Hyatt Master Plan in 2005, it claimed-

*“... there are substantial benefits to be gained from implementation of the proposed Master Plan. If the assumptions utilised here are realised, **restructuring the Hyatt Regency Master Plan to contain the hotel operations to its current size and expand the residential component can provide substantial benefits to the Sunshine Coast economy.**”*

That statement by Lendlease has proven fatal for the former Hyatt Regency Cooloom. In fact, the Hyatt, existed comfortably for the first 20 years at a time when Yaroomba's population was less than half of what it is now and there was no international airport.

Now again Yaroomba is staring down the barrel of a massive residential development in a Tourism Focus Area, proposed by a company whose main priority is residential development.

3. THE VIABILITY OF THE PROPOSED RESORT IS THREATENED

Tourist resorts, such as that proposed by Sekisui, may be a profitable venture for a developer. However, there is credible evidence available that the viability of a resort development is severely compromised when it is integrated with large-scale residential development. We believe the viability of the proposed resort here would be severely compromised, primarily because of the high probability of conflict between resort guests and permanent residents.

APPENDIX D hereto is the “*Tourism Planning Taskforce Report*”⁸ (The Taskforce Report), It was commissioned by the Minister for Planning and Infrastructure in the Government of Western Australia, who was concerned about:

“...the potential impacts of mixing tourism and permanent residential uses in a single development in respect to land use conflict, impact on the tourism experience, the residential amenity provided in such developments, and the loss of suitable and available land for future tourism development.”⁹

In addition, the very lengthy time proposed to construct the accompanying 1000+ dwellings may lessen the attractiveness of the proposed resort.

A. A HIGH POTENTIAL FOR CONFLICT

Sekisui, in its submission and in its extensive pre-decision publicity, has strongly emphasised that residents, not only from the proposed 1,000+ dwellings but also the wider Sunshine Coast public, can share in the use of resort facilities.

Tourists and permanent residents at tourist resorts have different aspirations and needs, and conflict between the two groups can easily arise. The Taskforce Report highlights this potential for conflict:

“There is potential for conflict between short-stay tourists and residents in a tourism facility due to the different objectives of the two groups. This conflict can manifest itself in many ways but has two primary outcomes:

- *devaluation of the tourism experience at the development through a non-tourism character or ambience; and*
- *impact on the amenity of the residents due to different lifestyle priorities to short-stay tourists, who in many cases have a higher recreation priority.”¹⁰*

⁸ Tourism Planning Taskforce Report, West Australian Government, 2006

⁹ Tourism Planning Taskforce Report, page 33

¹⁰ Tourism Planning Taskforce Report, page vi

B. WHAT IS AN ACCEPTABLE NUMBER OF DWELLINGS?

We believe the argument that a substantial residential component must accompany the resort construction to make the project a viable one for the developer is fallacious. In the foreword to the Taskforce Report, the Minister stated:

*“The key principle identified is that **a sustainable tourism industry, with its many inherent benefits, requires tourism development to be undertaken for tourism purposes.**”¹¹ [The Minister’s emphasis].*

The Taskforce Report reinforces our view:

“A sustainable tourism industry requires investors to be able to achieve reasonable operational returns, facilitating funding of marketing, maintenance and improvement of facilities. This is not achieved where development is real estate driven and not based on growth in tourism demand.”¹²

The Taskforce researched the maximum percentage of residential dwellings that, if exceeded, would cause unacceptable degradation of the tourism experience. As a result, it produced the following recommendation:

“Where a residential use component is supported on a non-strategic tourism site, the taskforce concluded that a maximum of 25 per cent residential use only should be considered. Above this level, the potential for the residential use to dominate the tourism orientation of a development significantly increases. In association with this limit, specific design and management guidelines also are required if the development is to be sustainable as a tourism facility.”¹³

Using Sekisui’s proposal to construct a 220-room hotel and the Taskforce Report’s 25% guideline, the maximum acceptable number of residential dwellings is 55. Sekisui’s proposal to construct 1,000 dwellings is unacceptable.

4. 5-STAR RESORT IN THE MIDST OF A CONSTRUCTION SITE

Sekisui has not given any indication of how long the construction of its proposal will take. Some information can be obtained from its supplied Traffic Report. This report assumes, for the purpose of calculating traffic flows, that construction will be completed “... 10 years from the year of opening”¹⁴ of the hotel. This means that hotel guests, expecting a 5-Star tourism experience will

¹¹ Tourism Planning Taskforce Report, page i

¹² Tourism Planning Taskforce Report, page v

¹³ Tourism Planning Taskforce Report, page vii

be accommodated within a construction site for the first ten years of operation. We strongly believe that occupancy rates will suffer greatly during this period.

5. THE RESORT IS UNLIKELY TO ACHIEVE A 5-STAR RATING

A cursory examination of the architectural drawings for the hotel reveals that outlook from inside around 20% of the rooms is of the walls of the serviced apartments. An absence of private green space would also appear to reduce the appeal for guests seeking an eco-tourism experience.

6. CONCLUSION

We suggest that Westin (the proposed resort manager), who should have full knowledge of likely conflicts between guests seeking a tourism experience and nearby residents, is unlikely to exercise its option to manage the resort. We ask that Council:

- take the recommendations of the Taskforce Report into account when assessing and determining Sekisui's application; and
- appoint an expert to report on the likelihood of the resort achieving a 5-Star rating within the first 10 years of its operation

N. NO JUSTIFICATION TO OVERRIDE SCPS

1. PROPOSAL SEEKS MAJOR DEVIATIONS FROM THE SCPS 2014

DW contends that SH have grossly understated the planning conflicts. The Applicant suggests the conflict under the SCPS 2014 is limited only to building height but, as detailed in this submission, there are substantial conflicts with the SCPS 2014's strategic framework, building height, density, character, scenic amenity, traffic and other matters.

2. SUFFICIENT GROUNDS

The SPA provides that an assessment manager may decide a development application in a way that conflicts with a relevant instrument only in certain circumstances. One of these circumstances is that there are sufficient grounds to justify the decision, despite the conflict.

This means that an assessment manager may:

- approve an application, even though the proposed development conflicts with a relevant instrument, if there are sufficient grounds for approving the development despite the conflict, or
- refuse an application, even though the proposed development complies with the relevant instruments, if there are sufficient grounds for refusing the development despite the fact that the decision would conflict with the relevant instruments.

The term grounds is defined in the SPA **to mean matters of public interest.**

It does not include considerations such as the personal circumstances of the applicant, the owner of the land or another interested party.

One of the matters that may be considered when determining whether there are sufficient grounds to justify a decision that conflicts with a relevant instrument is whether there is an Urgent need for the proposal.

3. NEED

DW does not believe there is a pressing need for either a premium hotel or an intense residential development at Yaroomba. See further detail in [L – ECONOMIC](#).

4. PUBLIC INTEREST

Clearly this proposal is not in the public interest:

- It is totally out of character and strongly opposed by the local community
- The economic benefits arising from the hotel are dubious at best
- The economic benefits arising from the residential development would be obtained from other residential developments in more appropriate settings
- The dense residential component is not required – the PS accommodates the requirements residential developments to meet the anticipated population increase
- The proposal is not consistent with Council’s Economic and planned (development).... corridor
- The proposal is not consistent with the SCPS 2014 Strategic Intent to maintain the Sunshine Coast as a community of unique communities – YB is low level relaxed casual style - not an intensive inner-city style
- There is no need for the development as proposed.

DW believes there are insufficient grounds to justify overriding the Planning Scheme in this instance. There is no pressing need for a hotel or an intense residential development and there are perfectly logical alternatives to providing a Hotel on the site which would not require the overriding of and/or possible resultant amendment of the SCPS 2014.

5. ALTERNATIVE PROPOSAL

DW submits that if an urgent need for a 5 star Hotel/Resort is established, then a low-rise, low-key, eco-lux resort across the entire 19ha site (or at least 75% of the site – leaving 25% for residential) would be –

- a superior outcome for tourism;
- would create more prestigious employment opportunities;
- would not substantially conflict with the SCPS 2014;
- would result in very little adverse impact on the local community;

- would boost the Sunshine Coast's natural competitive advantage and align with VSS theme of "Naturally Refreshing"
- would not require urgent upgrades to infrastructure, namely to the intersection of David Low Way and Beach Road (if this intersection is actually capable of being upgraded that is) and the intersection of School Road, Yandina-Coolum Road and South Coolum Road;
- (as a result of all of the above) would be a superior economic outcome
- would be welcomed by the local residents; and
- would increase the property value for local residents rather than detract from it.

O. OVERALL CONCLUSION

This is a S242 Application (MCU17/0095) in which SH are seeking to override the SCPS 2014. This S242 Application is combined with a Development Application for Stage 1 (MCU17/0096) and a Reconfiguration of Lot Application (REC17/0056).

The proposal seeks to override the SCPS 2014 provisions for the site and broadly sets aside the outcomes sought by the SCPS 2014 strategic intent and local plan, overlay and other codes.

The strategic framework sets the policy direction for the planning scheme area and forms the basis for ensuring **appropriate development occurs within the planning scheme area for the life of the planning scheme**. The proposal must therefore meet the SCPS 2014's Part 3 – ***Strategic Framework*** for development but fundamentally fails to do so.

There is no demonstrable need for this development because:

- It proposes an intensive high-rise, high density, residential estate outside of centres planned for this type of development. The residential density is not needed because the site is not required or planned to meet residential dwelling targets on the Sunshine Coast beyond densities consistent with the surrounding area. Dwelling density targets for the Sunshine Coast are to be met under the scheme in appropriate planned locations.
- It does not meet any need for a high-quality resort in a low-key coastal setting. The hotel provided is compromised because it sits within a high-density residential estate.
- Majority community sentiment is clearly opposed to the development. Support for the development would be shown if it met community needs but it does not. Instead the development fundamentally conflicts with the local community's values and represents cynical exploitation of the area.
- The proposal does not align with any of the Sunshine Coast's statutory, policy or strategic instruments.

Furthermore, approval of these current Applications will not advance the purpose of the *Sustainable Planning Act*.

Under the *Sustainable Planning Act (SPA)*, the Sunshine Coast Council has a duty to advance the Act's purpose. The purpose of the SPA is to "seek to achieve ecological sustainability". This means that any developments approved must result in a balance between the protection of ecological processes, economic development and social well-being. The Applications herewith (MCU17/0095, MCU17/0096 & REC17/0056) do not achieve this balance.

This proposal would be an inferior outcome for tourism. The Development Application currently lodged by SH is not focused on tourism but is designed to turn the Yaroomba beachside (and then possibly the former prestigious Hyatt Regency Coolum) into a dense residential area.

If this Development Application is approved, DW submits that –

- ❖ the Hotel proposed by SH will fail.
- ❖ the economic benefits for the community and the Sunshine Coast that could be achieved by a superior tourism outcome for the site, will be lost forever.
- ❖ all hope of having a unique world class eco-lux resort on the beach, and the resurrection of the former prestigious Hyatt Regency Coolum will be gone forever.
- ❖ The Strategic Framework, the policy document that sets the direction for the SCPS 2014 will be severely compromised.

The grounds listed by the applicant are largely erroneous and focus on the minor hotel component and economic benefits that are not unique to this site but would also flow from appropriate development in suitable planned areas. The applicant's grounds are grossly deficient and there is no basis for approval of the application.

When Council voted not to amend the SCPS 2014 in April 2015, it made a conscious decision that what was proposed at that time was not in the public interest. SH did not demonstrate a need for a Planning Scheme Amendment to provide what was proposed at that time. Apart from a few buildings being lower in height, this proposal does not differ greatly from the previous proposal for a PS Amendment. As was the case with the amendment, this proposal too, if approved, will have wide-ranging detrimental environmental and social impacts on the Coolum and surrounding communities.

Council's decisions in relation to this site should be consistent. Just as there were insufficient grounds to reject the Planning Scheme amendment, there are also insufficient grounds to justify the overriding of the SCPS 2014.

DW recommends that Council refuse MCU17/0055, MCU17/0066 and REC17/0056 as there is no demonstrable need that warrants the extensive overriding of the Planning Scheme and it would not be in the public interest to do so.

We would therefore respectfully ask Council to recognize the considerable contribution our Association made to the SCPS 2014 and to carefully consider our Submission herewith

Yours faithfully

A handwritten signature in dark ink, appearing to read 'L. Saxton', is placed over a light blue rectangular background.

Lynette Saxton
President,
Development Watch Inc.