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The Assessment Manager
Sunshine Coast Council
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Dear Sir/Madam,

Re: Application No's: MCU17/0095, MCU17/0096 & REC17/0056

DEVELOPMENT APPLICATION FOR PRELIMINARY APPROVAL FOR MATERIAL CHANGE OF USE OF PREMISES TO ESTABLISH YAROOMBA BEACH MASTER PLAN (S. 242), AND DEVELOPMENT PERMITS FOR MATERIAL CHANGE OF USE & FOR RECONFIGURATION OF A LOT (STAGE 1) AT DAVID LOW WAY, AND 17 & 28 BELLE MARE AVENUE, YAROOMBA QLD, LOTS 20 & 336 – 340 ON SP219217, LOTS 12 & 15 – 16 ON SP238214 AND LOT 25 ON SP269561, SH COOLUM PTY LTD

Established in 1980, the Sunshine Coast Environment Council (SCEC) is the peak environmental advocacy organisation for the Sunshine Coast region. SCEC currently represents 64 member groups predominantly working in the areas of natural resource management, conservation, environmental restoration and protection, sustainability and planning. This membership represents a collective of almost 10,000 individuals with a further 4000 people as SCEC supporters.

It is on behalf of our members, supporters and wider community with whom we engage that we provide the following submission for due consideration.

This submission is based on the current level of information provided and the stage of the assessment process at the present time.

BACKGROUND

The application was submitted on 4 May, 2017 by Project Urban Pty Ltd on behalf of SH Coolum Pty Ltd (registered landowner). Their 'Development Assessment Report' (Final Revision 04 May 2017) provided the following details of the submission / proposal, as well as a background comment regarding a previous request in 2015:-

- *S.242 Preliminary Approval for Material Change of Use Yaroomba Beach Master Plan*
- *Stage 1 - Development Permit for Material Change of Use for Resort Complex (220 Units), Multiple Dwellings/Short Term Accommodation (148 Dwelling Units) & Shopping Centre (2,770m²), Educational Establishment, Community Use (SLSQ Amenities) and Utility Installation*
- *Stage 1 - Development Permit for Reconfiguration of a Lot 10 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 easement).*
- *At the end of March 2015 Sekisui House lodged with Council a request for a planning scheme amendment to the Sunshine Coast Planning Scheme 2014. The aim of the request was to establish new development criteria in order to deliver a mix of resort (i.e. 5-star hotel), residential and retirement living with supporting commercial and retail opportunities*

ECONOMIC ISSUES

SCEC recognises that potential or perceived economic benefits are likely to be a considerable aspect in the assessment of the application. Accordingly, SCEC carried out a review of documents relevant to the economic impacts of the proposal. Below is a summary of the full report included as part of this submission (Appendix 1)

Sekisui House - Development Application at Yaroomba

[MCU17/0095 - Preliminary Approval for Material Change of Use, Yaroomba Beach Master Plan]

Review of Economic Impact Assessments

The following documents were reviewed in the report:-

2017 Sekisui Application

- Development Assessment Report (Final 04 May 2017) by Project Urban Pty Ltd
- Yaroomba Beach Economic Impact Assessment (Version 4.0 02 May 2017 by RPS Australia East Pty Ltd)

- Yaroomba Beach Economic Impact Assessment – Response to the Information Request (Version 3.0 03 October 2017) by RPS Australia East Pty Ltd
- Yaroomba Beach Village and International Resort Community Benefits Report (version 7.0 18 October 2017)

2015 Council Assessment (March 2015 request by Sekisui House as noted above)
Special Meeting Agenda 27 April 2015, Item 4.1.1 Consideration of Proposed Planning Scheme Amendments

- Report by Strategic Planning, Regional Strategy & Planning Department
- Attachment 9 - Urban Design Advisory Panel (UDAP) Advice – 2 April 2015
- Attachment 11 - MacroPlan Pty Ltd Economic Advice - 11 October 2014 (Report: *The Coolum Residences, Peer Review – RPS Economic Impact Summary*)
- Attachment 12 - Norling Consulting Pty Ltd Economic Advice – 9 September 2014 (letter)

Detailed comments on the documents are provided in the Review, but some brief extracts are as follows:-

2015 COUNCIL ASSESSMENT

The officer's report and associated relevant economic documents provide a background to the current application by Sekisui. They should also provide a reference point (in terms of statements therein) for the assessment of the new application.

The Report has effectively created a pre-emptive guideline for any subsequent application with a view (by Council) to capitalise on an opportunity to attract an international standard 5-star hotel.

The concern now, of SCEC (and others), should be the objectivity of the assessments of the economic, community and environmental issues, particularly with respect to consistency with matters as identified by this 2015 Council assessment.

2017 SEKISUI APPLICATION

The current application / reapplication addresses issues raised by the officer's report (2015), and Council, regarding the previous application as outlined above.

The Summary and Conclusion from the Review by SCEC are as follows:-

SUMMARY

This review has noted the following points of concern with regard to economic impacts associated with the development application by Sekisui for their Yaroomba site:-

- The economic assessments to determine the benefit to the community are likely to have overestimated the value by at least 17% due to inclusion of Noosa Shire and possible other errors. Previous independent advice to Council in 2015 considered the overall benefits (on a bigger proposal) to be

'modest' (ie not significant as claimed) on a regional basis. Further independent checking of accuracy needs to be arranged by Council (as done in 2015) as part of their assessment process.

- The contribution of the residential development is only about 25% of the total economic benefits, so the merit of at least twice (or up to 3 times) the density of development, as proposed, should be reconsidered.
- Although there will be additional residential dwellings and apartments created, it will still only be mainly a transfer of opportunity as noted by Council, because there is a limit to buyers coming to the Sunshine Coast region at any time.
- References to the airport extension for community benefit should not be relevant because the airport will be operated as a private investment for the next 99 years.
- Commercial viability aspects of the development proposal should not be considered in the assessment for changes to the Planning Scheme.
- There does not appear to be an urgent need to attract a 5 star resort to the Sunshine Coast because others already exist, including potentially the adjacent Palmer Coolum Resort. In this regard, the Maroochydore City Centre has also now been identified by Council as a desirable location for a new premium hotel as well as convention facilities, and is being actively marketed as such.
- The opening of the City Centre hotel could attract 50% of the potential 'new' visitors claimed by Sekisui, with a similar reduction in the value of economic benefits. Alternatively, such benefits should just be treated as a 'transfer of opportunity' as noted for the residential dwellings.
- Council may have 'conflicts of interest' for the development approval process with regard to the new runway and proposed convention facilities. It is the owner of the airport as well as the Maroochydore City Centre respectively. If the application is approved, Council will benefit by increased patronage of the airport, but will be adversely affected to attract a hotel and convention facilities to the City Centre project (or conversely if not approved).

CONCLUSION

An 'urgent' need for a new 5 star hotel was stated in the application as a primary reason to allow a change to the Planning Scheme. The current existence of several 5 star hotels and the identification of the Maroochydore City Centre site for a premium hotel and conference facilities do not support this claim.

In particular, the application does not refer to the 'game changer' Maroochydore City Centre project. The lack of reference to, and assessment of, the economic effects of the project is a major omission in the application.

The economic value of the residential development is also likely to be overvalued and generally not relevant to contribute extra to the economy (as previously noted by Council) because there is a limit to new arrivals / demand.

In view of the failure to acknowledge the City Centre project and other 5 star hotels in the region, the economic value for the hotel component is also likely to be significantly overvalued and generally not relevant to contribute extra to the economy because it will also just be a 'transfer of opportunity'.

The merit of beneficial economic impacts to warrant a change to the Planning Scheme as claimed in the Planning Assessment Report for the Sekisui project at Yaroomba is not supported by this review.

Whilst SCEC is primarily an environmental advocacy organisation, the apparent gross misrepresentation of the economic benefits, and therefore consequential impacts, in the Sekisui Application are of great concern. As the application is seeking to override the Planning Scheme under SPA s242, it is likely to be a significant aspect for decision making, both by the assessment manager, the Councillors, as well as perceptions by some in the community

SCEC highlights the shortcomings of the economic impact assessment to ensure that full and proper weight is given to all other aspects of concern raised by SCEC and our member groups.

Comment

The significance of a premium hotel within the new City Centre precinct is related to the last few paragraphs of the conclusion of the 2015 assessment report by Council:-

For these reasons, it is recommended that no amendment is made to the Sunshine Coast Planning Scheme 2014.

*However, the review of this proposal has reconfirmed the importance of attracting new premium hotel investment to the Sunshine Coast if the region is to remain competitive to emerging tourism demand (particularly international tourism) and to ensure the region continues to evolve as a high quality tourism destination. **It is considered appropriate to initiate an investigation of the opportunities that currently exist to accommodate premium hotel infrastructure and facilities. Such a review would include demand analysis for premium, short stay accommodation on a regional basis; appropriate site options; the requisite planning framework required; and whether development attraction initiatives should be contemplated.***

There is also likely to be a case to further consider the development parameters applicable to the subject site at a future date but any such proposal would need to

carefully consider the key strategic issues and local area dimensions that have been identified in this report.

The statement that is now relevant to the proposed premium hotel in the City Centre is in bold. Project Urban in their Report / submission have noted the statements before and after, but NOT that wording.

The City Centre project has progressed significantly since April 2015 when the Council assessment was completed. As such, it is now effectively an 'identified opportunity' for a premium (5 star) hotel (and conference facilities). Thus the claimed urgent need by Sekisui does not exist.

The application (as well as associated project marketing) has failed to refer to the envisaged CBD hotel and conference facilities, which are in a location allowable by the Planning Scheme with supporting, specific provisions to facilitate this type of development. Consequently, the assumptions in the economic assessments by RPS do **NOT** include any allowance for any impact on patronage. A 50% reduction in their estimated new patronage (and extra ongoing community benefit) is potentially likely, due to this other proposed new hotel and ancillary uses in the CBD.

In addition, the application does not note other existing 5 star rated hotels, or a possible resurgence (by others) of the Palmer Coolum Resort.

It is the above bolded statement in the Council report that is significant, when considered in association with Sekisui choosing to **NOT** refer to the proposed City Centre hotel. Inclusion would be expected to significantly reduce the economic assessments and claims, thereby negating any 'urgent' reason to warrant such a substantial change to the planning scheme.

Thus, a summation of the economic review by SCEC raises the following question:-

WHY DOES THERE NEED TO BE A CHANGE TO THE PLANNING SCHEME FOR YAROOMBA TO ALLOW A 5 STAR HOTEL AND HIGHER DENSITY DEVELOPMENT, WHEN THE PLANNING SCHEME ALREADY ALLOWS FOR BOTH IN THE MAROOCHYDORE CITY CENTRE, AND COUNCIL IS ACTIVELY SEEKING DEVELOPERS, INVESTMENT CONSORTIA AND TENANTS?

It is SCEC's contention, based on our review of economic aspects, that there does **NOT** need to be a change. Other significant concerns and issues are outlined below.

ENVIRONMENTAL AND ECOLOGICAL ISSUES

- Mt Coolum is listed on The [Register of the National Estate](#) (Record Identifier: 17737) and comprises fifty percent of plant species recorded on the Sunshine Coast. The cultural heritage values, biodiversity threats, visual amenity both from the mountain and the ground level as well as increasing pressure from foot traffic (and the myriad of activities, uses, events etc proposed) has not been addressed in the development application and must be duly considered.

Acid Sulphate Soils and Groundwater

Proposed excavation for basement car-parking, trunk infrastructure and associated works heightens the risk of mobilising ASS and a drawdown/dewatering of the groundwater aquifer on and potentially adjacent to the site (RFI response cover letter pgs 28 & 29)

SCEC submits that there has been inadequate assessment of these matters as part of this proposal eg no direct assessment of groundwater recharge rates and no direct assessment of aquifer hydraulic conductivity undertaken as part of the recent investigations¹ and consideration of climate variability. There is also a concerning over-reliance on management plans

Marine Nesting Turtles

- The development as proposed will significantly disrupt breeding and hatchling behaviour of the area's Endangered Loggerhead and Vulnerable Green Turtles due to its sheer density (in terms of dwelling, resident/visitor population and activities/uses) on what is currently a low-key unspoilt beach. And most importantly a DARK beach.
- The importance of protecting this nesting habitat was highlighted by the recent Loggerhead turtle nest at Beach Access 92 which is directly in front of the Sekisui parcel on 13 January 2018
https://m.youtube.com/watch?v=0znOW_3ZD6w&feature=youtu.be and [Coolum and North Shore Coastcare Facebook post](#)
- Yaroomba is listed as a section of a “**nesting or inter-nesting area identified as habitat critical to the survival of an endangered species of marine turtle**” – Loggerhead turtles – in the *Recovery Plan for Marine Turtles in Australia, Commonwealth of Australia 2017*. The threats listed in that recovery plan: light pollution, habitat modification, noise interference, recreational activities, etc, will all be exacerbated if this proposal is approved.
- Pumicestone Passage to Double Island Point are identified as habitat critical to the survival of marine turtles in Australia (specifically South-western Pacific loggerhead turtles), see Page 30 <http://www.environment.gov.au/system/files/resources/46eedcfc--204b--43de--99c5--4d6f6e72704f/files/recovery--plan--marine--turtles--2017.pdf>.
- The presence of such a large resident and visitor populations also poses unacceptable risks to the viability and importantly, the recovery of this species
- Light pollution from the proposed 7 storey buildings and light emitted from the 1000+ private dwellings could be considered to be tampering with a protected animal breeding place. Queensland has legislation in place to prevent this as outlined in the Department of Environment and Heritage Protection (EHP) information sheet on species management program, <https://www.ehp.qld.gov.au/licences-->

¹ Groundwater Modelling Assessment Report-Attachment 16 pgs 3 & 4 s2.3 and s2.4.1

[permits/plants---animals/documents/is---wl---smp.pdf](#) with minimum requirements for the development of a Species Management Program (SMP) as an 'approved species management program' under the *Nature Conservation (Wildlife Management) Regulation 2006*.

- Sekisui House/SH Coolum Pty Ltd should be obliged to refer this development to the Commonwealth Department of Environment and Energy under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to ensure any development on the afore mentioned site does not impact on the endangered loggerhead turtle population. Refer to: <http://www.environment.gov.au/heritage/management/referrals>
- The turtle impact report provided to Sekisui House/SH Coolum Pty Ltd by their consultant is flawed as the data set used to compile the report is incomplete rendering the statistical evidence incorrect (refer Coolum and North Shore Coast Care submission)
- Light effects on/from Yaroomba are presently negligible, night visitation to the beach by people is presently minimal, domestic dogs and cats have not been a threat to nesting turtles, turtle nests or hatchlings over the last 11 years of monitoring
- Light impact is a cumulative issue ie not just pertaining to the development site but to the stretch of beach from Yaroomba to Marcoola.
- Lighting issues will not be confined to the proposal site but will have a cumulative effect and will impact on the stretch of beach from Yaroomba to North Marcoola which is presently one of the darkest beaches in the Sunshine Coast Council LGA. There has **never** been a turtle nest in front of the high rise buildings at South Marcoola.
- The lighting strategy makes a number of suggestions/proposals – there is no evidence that they will be implemented or effective. There are questions regarding its compliance with public safety and CPTED principles.
- Other regrettable beach developments on the Coast, such as the development at Bokarina Beach by Stockland, have assessed that the works/development may have a significant impact on turtles. The necessary assessment of the significance of impact on turtles has not been undertaken in the case of this development proposal.

Wildlife: The subject site is adjacent to publicly-owned bushland and foreshore reserve which forms a critical wildlife corridor through to the bushland conservation reserves and expanded habitat nodes north and south. Development of this size and density will significantly impact on resident and migratory fauna inhabiting these reserves. Issues associated with such intense development include the impacts of light, noise, odour, and presence/movement of such a concentrated human population on native wildlife, which in the main are small, shy, nocturnal and cryptic. In densely urban areas, these species are typically displaced by either introduced or noxious or aggressive species. This is not the intent of Council's *Biodiversity Strategy* (newly crafted into the draft *Environment and Liveability Strategy*), nor does it meet Council's obligations under State and Federal legislation to protect native species (threatened or otherwise), particularly in areas removed from the Enterprise Corridor and the designated Growth Areas in the SCS. Wherever human density has increased adjacent to natural bushland, a significant increase in invasive weeds can be found, leading to the degradation of natural habitat and further displacement of native fauna. This proposed development will 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. The Department of Environment and Heritage Protection (EHP) information sheet on species management program, <https://www.ehp.qld.gov.au/licences-permits/plants-animals/documents/is-wl-smp.pdf> with minimum requirements for the development of a Species Management Program (SMP) as an 'approved species management program' under the Nature Conservation (Wildlife Management) Regulation 2006.

- Please also refer to tabulated summary of Fauna and Flora issues – Appendix 2

COASTAL ISSUES AND CLIMATE CHANGE

The vulnerability of this site to climate change impacts has barely been touched on in the application documents. SCEC submits that, while we are not critical of the consultant engaged by the proponent, we are concerned that the modelling for the coastal hazards (and therefore the relevant State Planning Policy) and planning scheme overlays are too conservative. It is counter-intuitive (and somewhat negligent) from a science and planning perspective to put this type of intensive infrastructure and large numbers of people at risk given the growing evidence and physical experiences/events from climate change.

Indeed, these and cumulative flood impacts arising from this development have not been adequately addressed.

PLANNING ISSUES

1. Height and density

This proposal substantially conflicts with both the height and density of development intended for the subject site in the *Sunshine Coast Planning Scheme* (SCPS). The applicant seeks a high density (maximum 1163 equivalent dwellings) residential development in a 19ha site located in an urban area clearly planned for low-density development in accord with the established low-key coastal character of Yaroomba. The proposal is a gross over-development of this site. The currently approved Master Plan allows for 315 dwellings on the same site. To increase from 315 dwellings remaining in the existing approval to over 1000 plus a hotel is clearly unacceptable. The proposal to increase height of buildings from 8.5m (specified in the SCPC) to up to 24.5m + FSL (3 nominal 7 storeys and the rest from 3-6 storeys) is totally out of character with the rest of the Yaroomba precinct, including the nearby Palmer Coolum Resort complex. Such height will significantly impact on the visual amenity and character of the Yaroomba area. Even if this height is measured from the original ground level (egg no onsite fill) the buildings will still be highly visible from various viewpoints around the area. There is a heavy reliance in the visual amenity modelling on the retention of the present dune profile and vegetation. Expected establishment/regeneration of vegetation has not considered the vulnerabilities of this vegetation to 'screen the development' in the context of climate and other variables. The sheer extent of the built-form is not sufficiently curtailed by appropriate and commensurate 'green space'.

- The proposal grossly conflicts with both the SCPS14 and the previous Master Plan approval.
- The proponent is essentially seeking a wholesale re-write of the applicable codes to create the 'Yaroomba Beach Site Development Code' in an effort to demonstrate 'acceptable solutions'. This is clearly unacceptable and demonstrates the extent of the departures from the SCPS and the level of speculative development presumed by the applicant.
- All the components of the proposal contained in the Yaroomba Beach Master Plan and the Yaroomba Beach Site Development Code/s contained in the Yaroomba Beach Preliminary Approval Document 08 October 2017 version 9.0 seek to override established and sound provisions in the SCPS14 to become code assessable. While this might be somewhat standard for a Preliminary Approval application under s.242, the breadth of these of myriad uses (including a possible aged care facility) and the extent of the departure from town plan were not advertised nor referred to by the applicant. The selective references of the application also ties in with the skewed community consultation and questionable notification
- Not only is the bulk and scale of the built form grossly non-compliant with the SCPS2014, but the minimal setbacks proposed throughout the development (notably for the dwelling town houses situated on the frontal dune), the lot sizes/configurations (ie Density zones A3 at 80-150 dwellings and A4 at 130-175 dwellings per hectare respectively) are unacceptable.

The visual space, and the irreversible environmental impact caused by light pollution (light spill) from 7 storey building heights which 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 Coolum-Yandina 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 whether it be an endangered species or not is unacceptable. There is ample research to back up this claim.

2. Inconsistent with Strategic Framework: The proposal is also inconsistent with the character outcomes sought by the SCPS Strategic framework. It is not responsive to the local setting and would introduce development more appropriate to the Maroochydore CBD or inner-city Brisbane. The proposal fundamentally conflicts with the key concepts under Theme 6 of the Strategic framework and its corresponding strategic outcomes, in particular 3.8.1(d) and (f). Nor is the proposal supported under the SCPS's other strategic outcomes. The applicant suggests the hotel component aligns with Council's economic development goals but there is almost NO explicit support for development of this nature under either the SCPS *Theme 2 – Economic Development* or Council's *Economic Development Strategy 2013-2033*.

3. Coolum Local Plan: The character of this high-density residential proposal also conflicts with the Coolum Local Plan. The SCPS prescribes that “The Coolum Local Plan area remains a low-key coastal community..”; “...uses which enhance the beachside character... are encouraged”; “Development “..is configured in a series of beachside villages and other precincts that sit lightly on the landscape..”; “Development is designed and sited to protect significant...views either to or from important landscape features.” These parameters are not met by the application, and even more significant disruption to scenic amenity will be experienced by numerous existing residential areas, eg on ‘Coolum Hill’ and above Point Arkwright

4. Precedent: The application threatens the integrity of the planning system and the process undertaken to development the SCPS14 for the Sunshine Coast. Approval of this application would set an dangerous precedent because it would fundamentally conflict with the provisions of the SCPS 2014; be without sufficient reasons to overcome the conflicts with the SCPS or the impacts the development would introduce; encourage further applications for development inconsistent with the SCPS and policies; cause future inconsistent applications to be harder or impossible to refuse due to compromised planning decisions.

5. Need: The applicant has not demonstrated sufficient need to warrant overriding the SCPS to justify its approval. The high-density residential component is not needed nor contemplated to enable the Sunshine Coast meet its residential planning targets; it does not meet the need for a high-quality resort in a low-key coastal setting; it does not align with Council policy. Furthermore many local residents (ratepayers), who invested in the area based on the SCPS 2014 intent and outcomes for the area, are opposed to this development due to the impact on their lifestyle and investment.

6. Insufficient grounds for support: There are insufficient grounds to support the proposal in accordance with Section 329 of the *Sustainable Planning Act 2009*. The grounds listed by the applicant are largely erroneous and focus on the minor hotel component and purported economic benefits that would be just as likely to result from more appropriate development of the site. The reasons giving for supporting the proposal are grossly deficient and do not form a basis for approval of the application or for overriding the SCPS.

Sekisui erroneously interprets that respecting the planning scheme means supporting the current approval. SCEC supports upholding the principles and intent of the planning scheme and the applicable provisions of the Coolum Local Area Plan

OPEN SPACE

There is existing deficit of open space in the Sunshine Coast LGA. Despite what SCEC considers inadequate open space provisions in the planning scheme (and more recently the Environment and Liveability Strategy) a 6000sqm park will not contribute to an improvement. The park is too small size to accommodate the envisaged (and quite fanciful) notion of being available (and usable) for hotel guests, a resident and transient population of almost 2000 people AND the public at large for a myriad of activities and uses.

By way of example, this small (0.6ha) area of proposed dedicated parkland is smaller than Yaroomba's existing Birrahl Park, which services only a few hundred residents.

SCEC also notes that only some of the land earmarked for the park is above the Q20 as required in the SCPS with a "*substantial amount of highly useable space is also provisioned below the Q20*"². This suggests that much of the already limited area allocated is constrained.

CULTURAL HERITAGE

- To date there has been a lack of comprehensive and updated cultural heritage assessment with Kabi Kabi First Nation by SH Coolum P/L, to develop an extensive cultural heritage management plan under the guidelines of the Queensland Aboriginal Cultural Heritage Act 2003.
- SCC has a dedicated RAP Officer who must be engaged to undertake the process before any approved development occurs.
- We respectfully refer to submissions made by the Traditional Owners themselves.

COMMUNITY ENGAGEMENT

SCEC considers the 'community consultation' approach undertaken by Sekisui House as seriously flawed. It has essentially been an aggressive marketing and lobbying campaign.

Please refer to our Community Engagement Analysis Report – Appendix 3

Summary

- This improper consultation means that Sekisui House (still) lacks a social license to operate prior to this current development application being lodged
- Sekisui's poor track record is being perpetuated in regards to consultation efforts with the community, leading to an incomplete license to operate in the community they wish to get consent from (ie. West Village in West End. Please refer '*Social Impact Assessment West Village West End*' Isabelle Oude-Egberink October 2015. Appendix 4)
- They did not seek input on the most controversial changes namely height and density.
- Any representations to Council that they conducted community engagement should be ignored in our view

² Hassell RFI Response #58 Flood immunity -

- Claims that their “community consultation process was above reproach” despite blatant flaws shows Sekisui’s arrogance and the poor regard they appear to have for community.

Sekisui survey (‘Listening Post’ version-sample attached Appendix 5)

In keeping with the skewed nature of their overall consultation approach and modus operandi, Sekisui’s survey was very non-transparent and superficial. Sekisui used the results solely from this survey to claim their ‘majority support’.

This survey did not enable any meaningful feedback from the community on the key issues/concerns raised by the community.

Their survey was non-transparent as they did not design it/write it in relevance to key community concerns and it was not focussed on concerns which had been raised by the community.

For example, they did not seek public feedback on the following details, which were raised as paramount community concerns in the meetings which had transpired between the community and developer. Nor from specific comment by SCEC representative Narelle McCarthy at the Sekisui convened ‘Discussion Group’ sessions. (Please see SCEC letter to Councillors dated 25 October 2016-Appendix 6)

- Issues of density and population pressures/changes
- Issues of building height
- Environmental issues
- Traffic management

Their questions consisted of stating elements of the development which instead, *had not* necessarily been contested by the community, or were of comparatively minor concern.

For example: (survey extracts)

1. A new coastal village with cafes, restaurants, and shops
2. New Public Parking & Access to Patrolled Beach

So, this survey provides no evidence that they have endeavoured to resolve key community concerns before claiming ‘majority support’ for their development.

Their survey sadly does not *enable* the public to *inform the design* of each of their proposed elements (points listed on the survey) of the development;

For example, the survey, by only asking whether the public are ‘for’ or ‘against’ a specific element of the development does not give the public any meaningful chance for feedback in relation to influencing each component of the development listed. The survey disables the public to influence the ‘hows’ of the development

Additional comment 'consultation'

- **High rise effects on local amenity:** There is a perception that while the public support sustainability principles, high-density development poses too great a cost on the character of Yaroomba and population pressures
- **'Donation' of 25% of the 19 Hectare site gifted back to the community on behalf of Sekisui has not yet been completely explained?** And community seems to be in the dark as to what this really means for future costs and responsibilities (exp. rates) of residents.
- **Exaggerated future customer base for the 'Yaroomba Beach' development?**
- Sekisui argues this site which will complement the expansion of the Sunshine Coast airport (however the planned upgrade is only founded on a projected increase of 11% of passengers.
- Past success of the Hyatt Regency Coolum Resort & Spa suggests that this size and scale of resort can function in balance with community desires
- There are serious questions pertaining to the propriety of Project Urban, as Sekisui's town planners and the applicant on behalf of SH Coolum Pty Ltd, being the 'portal' for receiving submissions to on-forward to Council for formal lodgement.

TOURISM

The proposed 220 room hotel (plus serviced 148 apartments), at just 6.6% (or 1/15th) of the residential yield and about 12% of the site's area, is only a minor component of what is essentially a high-density residential development. The hotel's setting within a high-density residential estate is not the style of resort anticipated by the SCPS for Yaroomba and would likely compromise its function and role in the local tourism sector and viability.

- There is an increasing desire to experience to simpler nature based tourism accommodation. A low-rise, eco-luxe resort would be more suitable to the area. This style of resort is popular globally and there is currently no true eco---resorts on the beach anywhere on the Sunshine Coast and would be a point of difference, which is increasingly hard to find in South East Queensland.
- The dominance of the residential component negates its description as a 'tourism destination.' This subsequently means it is cannot be supported by the SPP – State Interest Guideline for Tourism April 2016 in a number of ways.
- Notably, Policy 3 (page 7) – *Facilitating and streamlining the delivery of sustainable tourism 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

Yaroomba is already a desirable tourism and day visitor destination due to its low-key, natural attributes. Visitation and widespread popularity would likely decrease due to the fundamental, undesirable changes that this proposal would cause. The type of experience already offered by Yaroomba due to its inherent natural and ambience characteristics is becoming a rarity and must not be lost.

This proposal is not an 'eco-tourism' resort or development

Ecotourism Australia defines Ecotourism as "ecologically sustainable tourism with a primary focus on experiencing natural areas that fosters environmental and cultural understanding, appreciation and conservation".

"Ecotourism aims to preserve the integrity of the destination. Its focus is on conserving the local environment and historical heritage, while supporting the culture and encouraging people to look after the natural resources that attracts them to the region."

"Ecotourism is a form of tourism involving visiting fragile, pristine, and relatively undisturbed natural areas, intended as a low-impact and often small scale alternative to standard commercial mass tourism. It means responsible travel to natural areas conserving the environment and improving the well-being of the local people."

The elements of the development touted as 'ecotourism' and 'on track' for Eco Accreditation are the Coastal Ecology Centre and the Discovery Trail. These small component/activities do not qualify this development as 'ecotourism' as so aggressively and selectively promoted.

The Sunshine Coast should expect (indeed demand) that **all** developments embody sustainability principles- Not least of which to comply with the ESD object of SPA. Any sustainable design elements and largely self-branded 'green/sustainability' credentials, while having merit, are restricted to the hotel. The replication of the 5 star (and desired 6/ star) across the construction, habitation and inherent population of over 1000 dwellings will be not be achieved. And nor is it being sought by the applicant,

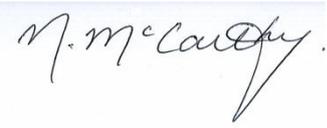
CONCLUSION

- There are insufficient grounds to support the proposal in accordance with *Section 329* of the *Sustainable Planning Act 2009*. The grounds listed by the applicant are largely superficial and focus on the minor hotel component and purported economic benefits that would be just as likely be derived from more appropriate development of the site.
- The gross conflicts with the *Sunshine Coast Planning Scheme 2014* and lack of demonstrated need warrant refusal of these applications.

We trust our submission is afforded due consideration.

Please let me know if any additional information or clarification is required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. McCarthy', is set against a light blue rectangular background.

Narelle McCarthy

Liaison and Advocacy

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