Chief Executive Officer
Cassowary Coast Regional Council
PO Box 887
Innisfail QLD 4860

By email to enquiries@cassowarycoast.qld.gov.au.

DATE

**Proposal:** Resort Complex

 (including staged modification, alterations and extensions) - Two (2) stages

**Address:** 2-20 and 24 Pacific Parade, Seaview Street and Marine Parade, Mission Beach

**Application No: MCU18/0006**

Dear Sir,

I write to object to the development application MCU 18/0006 for proposed material change of use for the above-listed foreshore lots. From documents available on the CCRC website it is clear that this development application forms only one part of a greater increased impact project relating to the ***significantly*** re-designed and re-developed resort, complete with 450 person capacity function centre and a 3 story apartment block on the opposite corner of Pacific Parade and Seaview Street.

The assessment of both this DA and the intimately connected DA MCU 18-0007 through separate applications grossly understates the cumulative and combined impacts of the entire project. It is proposed to re-develop an existing smaller scale, limited footprint resort into a much larger re-development expansion which combined, are significantly larger new structures, all of which exceed the CCRC Planning Scheme’s height restrictions, encroach upon residential zoned areas of the Mission Beach village, its significant natural environments and its intrinsic scenic amenity.

It is of great concern that while the CCRC has very recently commenced a *Coastal Hazards Adaptation Strategy consultation and planning process*[[1]](#footnote-1) in which coastal hazards, erosion and sea level rise inundation are to be scoped and at some stage discussed with the broader community during 2018 and 2019, that they would even consider expansion of development situated within the immediate vicinity of an eroding, storm tide inundation prone foreshore that is highly vulnerable to extreme weather events. It is of even more concern there would be consideration for an underground carpark which is worth noting was refused by the former council when approving a different proposal by the same proponent on the same site.

Will the CCRC take responsibility for the potential longer-term liabilities being created for the region’s rate payers should it approve DA MCU 18/0006and its parallel DA MCU 18-0007?

The number of persons the proposal is to accommodate is not specified. How can Council make a reasonable assessment of the proposals impact where the full capacity of this vastly expanded resort is not clear?

The new structures exceed the allowable footprint and height with a significant majority of the upper storey levels reaching 17.2m which is close to double the Planning Scheme’s existing 9.5m height limit to a maximum of 2 storeys. This alone clearly contravenes the Planning Scheme in every conceivable way.

I object to the whole of this development application on the following basis:

1. The material change of use proposed in the development application is incompatible with the existing CCRC Planning Scheme provisions, regardless what may have been indicated by Council prior to an impact assessment process commencing. Should Council be prepared to be so cavalier about this proposal, what else could be allowed under the currently Planning Scheme in the name of “economic growth”?
2. The design and scale of the proposed development is grossly inappropriate given the intent of the Environmental Significance, Coastal Processes and Acid Sulphate Soils overlays of the CCRC Planning Scheme.
3. The proposed development’s street frontage to Pacific Parade and its foreshore frontage to Marine Parade and it’s interfacing with adjoining properties is not compatible with existing Local Area Plan intent nor with the intent of the CCRC’s Planning Scheme
4. The application’s town planning report is patently misleading asserting at p 8 that the proposed structures are largely situated within both lower probability and higher probability ASS mapped areas. The entire footprint of this re-development proposal **is wholly and solely** located within the High Probability ASS mapped area.

There is a real risk of Acid Sulphate Soils’ (ASS) presence on the development site, and the potential for acid sulphate soils to permeate into the immediately adjacent Habitat Protection Zone of the Great Barrier Reef Marine Park World Heritage Area.
5. Building this vastly larger and more use-intensive resort re-development within the immediate coastal zone in today’s global warming impacted planning context contravenes and acutely jeopardises statutory management requirements for the immediately adjacent State Marine Park. This type of development is no longer viable, either economically or risk insurance-wise.
6. The development’s potential to significantly increase motorised traffic, human visitor and recreational use pressures on Mission Beach’s fragile and vulnerable natural environments, remnant essential habitats and threatened native species including cassowary. This is a high impact proposal for a small community and should not be considered by the CCRC before it has been referred for assessment against impacts on matters of NES under the EPBC Act.
7. The scale and style of the proposed development is completely contrary to the intent of the Qld Regional Plan which the CCRC Planning Scheme was required to reflect. Mission Beach is specifically singled out as a village activity centre, *"The urban footprint at Mission Beach will be constrained to minimise future impacts on ecological values, coastal hazard risks and loss of the village character. Densities are to be kept low and building heights limited to avoid increasing traffic generation and urban impacts".* This development proposal couldn't be more opposed to the intent of the plan which was developed with extensive public consultation.

It is also of great concern that while Council is Council is preparing a Master plan for the Mission Beach area, and in particular for the Greater Mission Beach township area, immediately to the north of the DA properties it is considering an approval of the nature of this DA (combined with MCU 18/0007) without awaiting the results of related community consultation processes, in effect pre-empting any considered outcomes of a current significant master planning exercise.

The CCRC should not approve this development for the above stated reasons.

Yours sincerely

NAME and ADDRESS

1. http://www.cassowarycoast.qld.gov.au/cassowary-coast-coastal-hazards-adaption-strategy [↑](#footnote-ref-1)