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

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

DATE

**Resort Complex**

 (including Staged Short-term Accommodation and Function Facility) - Two (2) stages

**Address:** 2 Seaview Street, and 1, 3 and 5 Pacific Parade, Mission Beach

**Application No: MCU18/0007**

Dear Sir,

I write to object to the development application MCU 18/0007, for proposed material change of use for the above-listed foreshore adjacent lots. From documents available on the CCRC website it is clear that this development application forms only one part of a greater increased impact tourism project centred on the wholesale re-development of the entire foreshore block bordered by Marine Parade, Seaview Street and Pacific Parade. Contrary to the DA documentation, including the Town Planning report, there is in fact no “Pacific View Parade” at Mission Beach.

The assessment of both blocks through separate DA applications appears to grossly understate and underplay the cumulative and combined impact of the entire project to re-develop the existing smaller scale, limited footprint resort into a significantly larger impact re-development, which will in effect build two entirely new structures, both of which exceed the CCRC Planning Scheme’s mandated height restrictions and encroach upon designated residentially zoned areas of the Mission Beach village, and its significant natural environments and its intrinsic scenic amenity.

The CCRC must take responsibility for the potential longer-term liabilities being created for the region’s rate payers should it elect to approve this DA and its parallel DA MCU 18-0006, both of which are situated within the immediate vicinity of an eroding, storm tide inundation prone foreshore that is highly vulnerable to extreme weather events.

I understand that this DA concerns a proposed new function facility (to a height of 10.3m and with capacity of up to 450 people at any one time) together with holiday apartments in an adjacent 3 storey structure (1 storey

over and above the statutory Planning Scheme), and covering 1.5 times the allowable site cover. I am aware of the site’s exposure to probable Acid Sulphate Soils risk.

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 caviller about this proposal, what else could be allowed under the current Planning Scheme’s provisions in the name of “economic growth”?
2. The design and scale of the proposed development is inappropriate given the Environmental Significance, Coastal Processes and Acid Sulphate Soils overlays as they are presently mandated for under the CCRC Planning Scheme.
3. The proposed development’s street frontage to Donkin Lane and Seaview Street 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 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. Section 2.3.2 Objectives for Habitat Protection Zone (Great Barrier Reef Marine Park Zoning Plan[[1]](#footnote-1)) states that:

*The objectives of this Zoning Plan for the Habitat Protection Zone are:*

1. *to provide for the conservation of areas of the Marine Park through the protection and management of sensitive habitats, generally free from potentially damaging activities; and*
2. *subject to the objective mentioned in paragraph (a), to provide opportunities for reasonable use.*

The application’s town planning report asserts at p 5 that the proposed structures are largely situated within the site’s High Probability ASS mapped area.

1. Building this new development as a key component of the 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.

1. 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.
2. 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 Masterplan 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.

It also appears that the CCRC has only very recently commenced a Coastal Hazards Adaptation Strategy consultation and planning process[[2]](#footnote-2) 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.

An approval of this DA would appear to pre-empt the potentially significant related issues which apply in this instance.

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

Yours sincerely

NAME and ADDRESS

1. <http://www.gbrmpa.gov.au/__data/assets/pdf_file/0015/3390/GBRMPA-zoning-plan-2003.pdf> [↑](#footnote-ref-1)
2. http://www.cassowarycoast.qld.gov.au/cassowary-coast-coastal-hazards-adaption-strategy [↑](#footnote-ref-2)