

DIRECTORS

C.R. Andrews L.S., B.App.Sc.(Math), B.Surv., QSSA
A.R. Bell BRTP (Hons), BBST (Surv), M.P.I.A., MDIA
B.W. Bell BRTP, M.P.I.A., CPP, MDIA
A.J. Campbell L.S., B.Surv., Grad.Dip.Surv.Prac., QSSA
I.K. Smith L.S., B.App.Sc.(Surv.), Grad.Dip.Surv.Prac.,
Grad.Dip.Hum.(Geog), QSSA

ASSOCIATES

K.L. Kenna L.S., B.Eng (Surv & S.I.S.), QSSA
C.B. Page BRUP, M.P.I.A.

www.mursurv.com info@mursurv.com

Murray & Associates (Qld) Pty Ltd



ACN 075 543 154 ABN 81 075 543 154

8 October 2025

The Hon. Jarrod Bleijie MP

Deputy Premier
Minister for State Development, Infrastructure and Planning
Minister for Industrial Relations
1 William Street
Brisbane QLD 4000
PO Box 15009
City East QLD 4002

Dear Minister Bleijie,

RESPONSE TO INFORMATION REQUEST (MBN25/959)

Property Description:	Lot 10 on SP132272 & Lot 6 on SP184133
Property Location:	1807 Roys Road, Coochin Creek QLD 4519
Proposed Development:	Application for a Development Permit for an Other Change to an Existing Approval – Tourist Park [comprising 150 Sites (75 Cabins & 75 Camp Sites) and Ancillary Recreation Facilities] & Operational Work (Stormwater, Earthworks and Access)
Local Government Area:	Sunshine Coast Regional Council
Your Reference:	MBN25/959
Our Reference:	100497
Applicant:	Coochin Creek Property Pty Ltd

1.0 PREAMBLE

With reference to the above development application, we hereby provide our formal response to the State Minister's Information Request dated 9 July 2025, submitted pursuant to Section 13 of the Development Assessment Rules.

In response to the Information Request, the following supporting documentation has been prepared:

- Amended Site Master Plan, prepared by CUSP (**Appendix A**)
- Landscape Concept Plan, prepared by CUSP (**Appendix B**)
- Amended Environmental Amenity Report, prepared by MWA Environmental (**Appendix C**)
- Operational Management Plan, prepared by Comiskey Group (**Appendix D**)
- Economic Need Response, prepared by Location IQ (**Appendix E**)
- Traffic Engineering Response, prepared by SLR Consulting (**Appendix F**)
- P&E Court Judgement (**Appendix G**)
- Effluent and ASS Response, prepared by Gilbert & Sutherland (**Appendix H**)
- Water Supply and Sewer Concept Plans (**Appendix I**)
- Waste Management Plan, prepared by Comiskey Group (**Appendix J**)
- Bushfire and Ecology Response, prepared by North Coast Environmental Services (**Appendix K**);
- Engineering Response, prepared by Covey & Associates (**Appendix L**);
- Hydrology Response, prepared by Water Engineering Partners (**Appendix M**); and
- Waterway Barrier Works Assessment, prepared by 28⁰ South Environmental (**Appendix N**).

Minor design alterations are detailed below in Section 2.0 and have been made in direct response to the items raised in the Information Request.

Sunshine Coast - Head Office

15-17 Currie Street Nambour
PO Box 246 Nambour 4560
Phone 07 5441 2188

Caboolture

4/75 King Street
PO Box 377 Caboolture 4510
Phone 07 5495 1478

Gympie

24 Reef Street
PO Box 57 Gympie 4570
Phone 07 5482 1484

Emerald

Unit 2, 17 Opal Street
PO Box 665 Emerald 4720
Phone 07 4987 5363

2.0 INFORMATION RESPONSE

Item	Information Requested
ShapingSEQ 2023	
1.	<p>Issue: The site is located within the Northern Inter-Urban Break (NIUB) in <i>ShapingSEQ</i>. The submitted material provides limited information with respect to the development in the NIUB.</p> <p>Action: Demonstrate how the proposal located on the premises within the NIUB responds to the intent and core values of the NIUB as articulated in <i>ShapingSEQ</i> (page 182).</p>

Applicant's Response:

The proposed development has been designed in a site-responsive manner that respects and enhances the intent and core values of the Northern Inter-Urban Break (NIUB) as articulated in *ShapingSEQ*. The proposal for a Tourist Park comprising 150 sites (75 cabins and 75 camp sites) with ancillary recreation facilities which supports tourism and outdoor recreation opportunities and will maintain the non-urban character of the NIUB, protect environmental values, and deliver compatible economic and community benefits. The response to each of the seven NIUB core values is provided below.

1. Urban Break

The proposed development maintains a clear separation between the Sunshine Coast urban areas and the northern Brisbane growth front (Brisbane to Caboolture metropolitan area) by retaining the site's non-urban character. The built form is low-scale and integrated into the natural setting, ensuring the visual and functional role of the NIUB as a buffer is preserved. The development also protects the landscape values of the regional inter-urban break by maintaining it as a non-urban land area, free from urban elements and infrastructure such as reticulated water and sewerage.

In addition, the proposal enhances the natural environment and ecosystems through the removal of farming contaminants, extensive revegetation and landscaping of the currently cleared areas, and its ideal siting for the proposed 'Eco Park'. The development celebrates the natural environment through understanding and appreciation of the Pumicestone Passage and Pumicestone Passage National Park, including their cultural and heritage values. In doing so, it facilitates community awareness, appreciation, and conservation efforts, ultimately contributing to an environmentally sustainable outcome.

2. Water Quality

The design incorporates stormwater quality and quantity management measures, as outlined in the Stormwater Management Plan, to maintain and restore natural hydrological functions while protecting downstream water quality in receiving estuarine systems, wetlands, and habitats connected to the Pumicestone Passage. Operational works will be carefully managed to prevent erosion, sedimentation, or other adverse impacts on sensitive waterways.

It is also noted that the site's previous use for intensive strawberry farming has ceased. The applicant has undertaken land remediation, including the removal of plastics from the soil and the elimination of chemical use, thereby preventing associated runoff and improving the local environmental conditions.

3. Biodiversity

The development footprint is confined to areas that have been previously cleared and disturbed. Substantial setbacks (min. 50m) will be maintained between the camping and cabin areas and the adjoining Pumicestone Passage and National Park.

The proposal incorporates on-site vegetation retention and extensive revegetation and landscaping works that will enhance the site's ecological values, delivering a net gain in native habitat for foraging, nesting, and refuge for local fauna. Landscaping will utilise native species to strengthen ecological connectivity and support the health and resilience of surrounding ecosystems.

4. Amenity

The proposal will protect and enhance the site's scenic values through extensive landscaping embellishments (as described above) and the establishment of an 'eco park' that facilitates community awareness, appreciation, and conservation of the Pumicestone Passage and Pumicestone Passage National Park, including their cultural and heritage values. In addition, low-impact lighting, noise management, and design controls will ensure that the amenity of surrounding land uses is maintained.

5. Culture

The proposed 'Eco Park' celebrates the natural environment through understanding and appreciation of the Pumicestone Passage and Pumicestone Passage National Park, including their cultural and heritage values. This approach encompasses respect for Indigenous landscape values and visitor experiences. Guests will be provided with information and materials that promote environmental conservation, cultural interpretation, and a deeper appreciation of the surrounding natural setting.

6. Prosperity

The development will generate economic benefits by increasing visitation, supporting local suppliers and tourism operators, and contributing to the broader Sunshine Coast tourism economy, while also creating and sustaining local employment opportunities.

7. Community

The tourist park will provide public access to nature-based recreational opportunities consistent with the NIUB's objectives. Facilities will support active and passive recreation in a way that is compatible with the environmental and landscape values of the area, fostering community connection to the natural setting.

Summary

In summary, the proposed tourist park is consistent with the NIUB's intent to protect environmental and landscape values while supporting tourism and compatible economic and community outcomes. The development will maintain the NIUB's role as a distinct non-urban area between metropolitan centres while enhancing its ecological, scenic, cultural, and recreational functions.

Item	Information Requested
Rural zone	
2.	<p>Issue:</p> <p>The subject site is located within the Rural Zone under the <i>Sunshine Coast Planning Scheme 2014</i> (Planning Scheme) and currently holds an existing development approval for Nature-based tourism. This change application seeks to amend the approved use to a Tourist Park.</p> <p>The Planning Scheme identifies that a Tourist Park is a 'potentially consistent use' for the Rural Zone where appropriate, having regard to its location, nature, scale and intensity and where it does not compromise the use of the land for rural activities. The submitted town planning report, dated October 2024, does not adequately demonstrate these matters.</p> <p>Action:</p> <p>(a) Demonstrate that the proposed development is appropriate in this location having regard to the location, nature, scale and intensity of the proposed development.</p> <p>(b) Demonstrate that the proposal has been located, designed and will be operated so as not to compromise existing and future rural activities in the surrounding rural lands.</p> <p>(c) Demonstrate that a reasonable level of privacy and separation will be achieved between cabins and car parking areas, and with buildings on adjoining properties.</p> <p>(d) Provide detail showing how car parking areas will be treated along the Pumicestone Passage frontage, with particular emphasis on a visually softened and well-landscaped interface that enhances the site's visual amenity.</p>

Applicant's Response:

In response to Item 2(a), the subject site and its surrounding environmental attributes are unique. Regardless of whether it is classified as Nature-Based Tourism or a Tourist Park, the proposed facility has a clear focus on establishing an 'Eco Park' that provides activities enabling guests to appreciate, interpret, and conserve the natural environment. These activities include:

- Ecotours along Pumicestone Passage with an environmental, heritage, and Indigenous focus;
- Sailing, boating, kayaking, and stand-up paddleboarding (SUP);
- Swimming and fishing; and
- Bushwalking within the site.

The proposed Tourist Park is contained entirely within the existing approved development footprint and adopts all principles of the previously approved Nature-Based Tourism use, including potable water supply, on-site effluent disposal/treatment, and on-site stormwater management. Camping areas and cabin layouts are generously spaced, with average separations significantly exceeding those typically found in urban Tourist Park environments.

The location, nature, scale, and intensity of the proposed development are considered entirely appropriate for this site. The location is ideally suited for nature-based activities given its proximity to the Pumicestone Passage and adjoining National Park, while still being sufficiently separated from urban areas to maintain the integrity of the regional inter-urban break. The nature of the development is low-impact, environmentally sensitive, and compatible with the surrounding non-urban landscape, with design measures that protect ecological values and avoid adverse environmental impacts. The scale of the proposal is modest, being confined to a previously disturbed and approved development footprint, and the intensity of use is limited by generous site layout, substantial vegetated buffers, and an overall low building density. These characteristics ensure that the development sits harmoniously within the setting, supports local environmental and cultural values, and aligns with both planning intent and community expectations for this location.

In response to Item 2(b), the proposal is low-impact, confined to previously cleared and disturbed areas, and includes substantial separation (greater than 300m) to productive rural land to the west of the site, hence undoubtedly protects existing rural land uses. In summary, the development complements the rural character and can coexist with and support ongoing rural activities.

Please refer to the Amended Environmental Amenity Assessment prepared by MWA attached in **Appendix C**.

In addition, the site density of the proposed eco park is far less than that of a typical tourist park. The proposal has a total of 150 sites across a total development footprint of approximately 20ha, equating to 1 site per 1300sq.m of developable area. As a comparison, Sandstone Point Holiday Resort has 282 sites across approximately 9.5ha (1 site per 337m²) and Big 4 Caloundra has 145 sites across approximately 3.3ha (1 site per 230m²). The very low density of the proposal when compared to typical tourist parks, plus the large setbacks to the adjoining natural environment, demonstrate that the development has been appropriately designed with regard to its location, nature, scale and intensity. The low density also provides more opportunities for the currently cleared and degraded site to be landscaped/revegetated.

In response to Item 2(c), please refer to the Amended Site Master Plan (**Appendix A**) for detailed site and building layouts. The Landscape Concept Plan prepared by CUSP (**Appendix B**) also illustrates indicative landscaping measures between cabins and associated parking areas.

In summary, and in accordance with AO5.3 of the Relocatable Home Park and Tourist Park Code (using the Sunshine Coast Planning Scheme as the benchmark), all sites and cabins:

- (a) Are setback at least 12m from external roads;
- (b) Are setback at least 5m from property boundaries;
- (c) Maintain a minimum 3m separation between cabins;
- (d) Have a frontage of at least 10m to any internal accessway; and
- (e) Provide cabins with a clear outdoor area of at least 2.5m by 2.5m.

The layout has been designed with regard to surrounding sensitive receivers on adjoining allotments. The westernmost cabin sites maintain a minimum 100m separation and vegetative screening from the shed on Lot 7 on SP106174, with a 150m separation to the dwelling on that lot. All other sensitive receivers are located further afield, ensuring that the development operations maintain appropriate separation and visual buffers from neighbouring properties.

Please also refer to the Amended Environmental Amenity Assessment prepared by MWA attached in **Appendix C**.

In response to Item 2(d), please refer to the Amended Site Master Plan and the Landscape Concept Plan prepared by CUSP, attached in **Appendix A** and **Appendix B**. These plans provide detailed information on site layout and landscaping treatments, including car parking areas along the Pumicestone Passage frontage. The parking area is setback over 40m from the Highest Astronomical Tide line and has been designed to be visually softened through extensive use of native vegetation, screen planting, and landscaped buffers, creating a well-integrated and attractive interface with the waterfront. This approach enhances the visual amenity of the site while maintaining accessibility and functionality for visitors.

Item	Information Requested
Interface	
3.	<p>Issue: <i>ShapingSEQ</i> includes requirements to protect and nurture the regional biodiversity and manage regional landscapes particularly in the Ramsar listed marine waters and islands including the Pumicestone National Park and Pumicestone Passage – Bribie Island National Park areas.</p> <p>Action: (a) Provide an Operational Management Plan that includes, but is not limited to, measures demonstrating: i. how access to the adjoining National Park and the interface with sensitive environmental areas will be managed ii. that the use of the esplanade and foreshore areas for water-based activities will not result in damage to mangroves, intertidal zones, and shoreline habitats (b) Identify any proposed works necessary to support associated off site activities including revetment walls, pontoons and mooring points. (c) Outline the best practice environmental management measures proposed to protect shorebirds, native fauna and flora within and adjacent to the Pumicestone Passage and Moreton Bay.</p>

Applicant's Response:

In response to Item 3(a), please refer to the Operational Management Plan, prepared by the Comiskey Group and attached in **Appendix D**.

In response to Item 3(b), please refer to the Operational Management Plan prepared by the Comiskey Group and attached in **Appendix D**. No new works are proposed to support the associated off-site activities, as access to the Pumicestone Passage will be provided via existing infrastructure, including the existing jetty, boat launching areas, and the public boat ramp.

In response to Item 3(c), the following key environmental management measures will be implemented:

- Guests will have access to information and materials that promote conservation, interpretation, and appreciation of the surrounding environment.
- Substantial setbacks will be maintained between camping and cabin areas and the adjoining Pumicestone Passage and National Park.
- Significant revegetation and landscaping works will enhance the site's ecological values, providing a net gain in native habitat for foraging, nesting, and refuge for local fauna.
- Bushwalking will not be permitted within the adjoining National Park. "Do Not Enter" signage will be installed at regular intervals and strictly monitored by on-site management.
- Access to the Pumicestone Passage will utilise existing infrastructure as noted in the Operational Management Plan attached in **Appendix D**.
- All lighting will be designed in accordance with AS 4282 to minimise obtrusive outdoor lighting effects.
- Waste bins will be conveniently located throughout the site, with disposal continually monitored by on-site management.
- No dogs or other domestic animals will be permitted on the site.
- The development will not generate off-site impacts from built form or stormwater runoff to the surrounding environment.
- All development will be undertaken in accordance with the Stormwater Management Plan, maintaining existing flow regimes and incorporating stormwater quality treatment prior to discharge off-site.
- On-site effluent disposal will be managed in accordance with best-practice environmental standards.

Item	Information Requested
Tourism	
4.	<p>Issue: The Strategic framework of the Planning Scheme encourages tourism-related activities, infrastructure, and facilities to occur in designated tourism focus areas, but recognises that other tourism opportunities outside of designated tourism focus areas may be considered on their individual merits.</p> <p>The Economic Needs Assessment provides a broad overview of tourism trends in a regional context but does not clearly demonstrate how the merits of this specific proposal support its location outside a designated tourism focus area.</p> <p>Action: Demonstrate why the proposal should be supported in this location outside a designated tourism focus area. For example, provide information, including but not limited to, the merits of this proposal in this location to meet a latent or unmet demand for a tourist use.</p>

Applicant's Response:

The proposed Coochin Creek eco park directly supports tourism growth within the Moreton Bay–Sunshine Coast Non-Urban Inter-Urban Break (NIUB), as outlined in response to Item 1 of the Information Request. This area is strategically designated to protect the local environment while preserving opportunities for agriculture, tourism, and outdoor recreation.

The subject site has been carefully selected due to its proximity to unique natural and scenic attributes. A defining quality of this location is the combination of values it offers:

- Experiences within the site itself.
- Immediate adjacency to national and marine parks.
- A highly desirable waterfront setting.

Opportunities for waterfront tourism facilities within such a scenic and natural environment, while still being easily accessible to urban centres, are rare. This distinctive combination positions the subject site as an ideal location to attract tourists seeking to enjoy and appreciate Queensland's natural and scenic assets. Its unique and rare attributes create a demand not easily replicated elsewhere, making the proposed use particularly well suited to this location.

The eco park is designed to celebrate and enhance appreciation of the natural environment, with particular emphasis on the Pumicestone Passage and the Pumicestone Passage National Park. These areas are of significant cultural and heritage value. The proposal fosters:

- Community understanding and awareness of environmental values.
- Conservation and stewardship efforts.
- Environmentally sustainable outcomes.

Through education, interpretation, and immersive nature-based experiences, the project strengthens the connection between visitors and the local environment, ensuring that ecological and cultural values are recognised and protected.

In addition to its environmental role, the Coochin Creek eco park will provide substantial economic benefits to Queensland, and especially to the Sunshine Coast region, including:

- 20,350 new visitors annually
- 85,600 additional visitor nights per year
- Over \$34 million in new visitor expenditure
- 94 local jobs during the construction phase

- 164 ongoing operational jobs
- Annual contribution of \$18.6 million to Gross Regional Product (GRP)

These figures highlight the project's role in stimulating regional tourism and supporting local employment while ensuring the environmental sustainability of the area.

In summary, the Economic Need Assessment confirms a clear planning need for the proposed Tourist 'Eco' Park. The subject site's unique locational attributes, including its proximity to the Pumicestone Passage and the adjoining National Park, make it ideally suited for nature-based activities and appreciation. The proposal is designed to enable guests to engage with, interpret, and conserve the natural environment while at the same time delivering significant economic and community benefits to the Sunshine Coast region.

Item	Information Requested
Economic needs assessment	
5.	<p>Issue: The Economic Needs Assessment provides a broad overview of the tourism trends and economic need for the development, but further detail is required.</p> <p>Action: (a) Provide further information in relation to the following aspects raised in the Economic Needs Assessment:</p> <ul style="list-style-type: none"> i. details of the seasonal and full-time employment directly attributable to this proposal. ii. key businesses and services that will be positively supported by this proposal. iii. how the development will improve the services and facilities available in the locality. iv. how the proposal contributes to competition and consumer choice and clarifies why this contribution represents a genuine planning or community need. v. how the proposal supports the strategic priorities and vision of Destination 2045: Delivering Queensland's Tourism Future.

Applicant's Response:

In response to Item 5, please refer to the Economic Need Response prepared by Location IQ attached in **Appendix E**.

With reference to Item (a)iv, the Economic Need Assessment confirms a clear planning need for the proposed Tourist 'Eco' Park. The subject site's unique locational attributes, including its proximity to the Pumicestone Passage and the adjoining National Park, make it ideally suited for nature-based activities and appreciation. The proposal is designed to enable guests to engage with, interpret, and conserve the natural environment while at the same time delivering significant economic and community benefits to the Sunshine Coast region.

Item	Information Requested
Amenity	
6.	<p>Issue: While the submitted Environmental Amenity Assessment has addressed potential reverse amenity impacts on existing agricultural operations, it does not consider the potential for reverse amenity impacts arising from the lawful use of surrounding rural land that is currently not under cultivation, or the implications of introducing significant volumes of non-rural traffic into a rural area.</p> <p>Action: (a) Provide an assessment of how the proposed development will avoid reverse amenity impacts on the lawful future use of adjoining rural land for agricultural purposes, in particular to 1771 Roys Road. (b) Provide an amended Environmental Amenity Assessment that demonstrates how increased traffic, especially from non-rural activities, will not impact on the ongoing operation of agricultural activities that are dependent on the efficient movement of heavy vehicles along Roys Road.</p>
7.	<p>Issue: While the submitted Environmental Amenity Assessment addresses noise impacts associated with the proposal, several matters remain unresolved and require further clarification.</p> <p>Action: (a) Revise the Environmental Amenity Assessment to include the following: i. confirmation that the report has used a conservative 'worst case scenario' approach relating to accommodation numbers and that assessments of all activities proposed on site reflect the maximum numbers of people anticipated to occupy those areas ii. confirm that the potential use of generators at unpowered camping sites has been considered in the noise impact predictions iii. Revise the line source for the slow moving refuse truck at the Back of House area to align with the Heavy Rigid Vehicle swept path provided in the Traffic Impact Assessment iv. Provide an assessment and prediction of front lift waste collection noise at a source height of 6m as indicated by the swept paths in the Traffic Impact Assessment report as being the servicing vehicle.</p>

Applicant's Response:

In response to Item 6(a), please refer to the Amended Environmental Amenity Assessment prepared by MWA attached in **Appendix C**.

In response to Item 6(b), please refer to the Traffic Engineering Response prepared by SLR Consulting attached in **Appendix F**.

In response to Item 7, please refer to the Amended Environmental Amenity Assessment prepared by MWA attached in **Appendix C**. In relation to 7(a)ii., we confirm that all sites will be powered.

Item	Information Requested
Road Network	
8.	<p><u>Issue:</u> The Traffic Impact Assessment (TIA) identified that the recent upgrade to the Roys Road/Bells Creek Road intersection has restricted right-turn movements from Roys Road onto Bells Creek Road eastbound. While this right-turn movement is currently not permitted, the TIA indicates there is demand for it, and the trip generation and intersection capacity analysis have been based on its availability.</p> <p><u>Action:</u> Since the right-turn movement is currently not permitted, the TIA should either: (a) provide evidence confirming that this movement will be implemented, specify agreement from the responsible party, and include an anticipated timeframe for its implementation; or (b) be revised to remove any reliance on the right-turn movement.</p>
9.	<p><u>Issue:</u> As part of the submitted materials for the nature-based tourism development approval for the site, a Road Safety Assessment of Roys Road was prepared, based on a proposal for 100 camp sites. According to the TIA, the Road Safety Assessment identified several safety deficiencies along this section of road and recommended a range of upgrades and mitigation measures to enhance road safety and amenity. A copy of this assessment was not included with this application.</p> <p><u>Action:</u> (a) Demonstrate that Roys Road provides safe and reasonable access to the site, is constructed to an all-weather standard, and can accommodate the projected traffic volumes associated with the proposed development. (b) Provide a copy of the Road Safety Assessment and confirm that it adopts a conservative 'worst case scenario' approach, based on the full capacity allowable under the change application. (c) If the Road Safety Assessment does not address an increase in accommodation and staff numbers consistent with the anticipated increase in patronage, submit an updated assessment that considers the full capacity of the development, and: i. considers that Heavy Rigid Vehicles (HRV), Refuse Collective vehicles and cars towing caravans will be accessing the site ii. identifies and addresses potential conflict zones with heavy haulage vehicles associated with existing agricultural operations along Roys Road. (d) Outline any revised road upgrade requirements resulting from the increase in traffic generation for the development.</p>
10.	<p><u>Issue:</u> The TIA notes that the development is intended as a destination where guests are expected to remain on-site throughout their stay, due to the extensive amenities, activities, and facilities provided.</p> <p><u>Action:</u> The anticipated traffic demand and trip generation assumptions should be revised to reflect that visitors are likely to travel off-site to engage with surrounding tourism offerings.</p>
11.	<p><u>Issue:</u> The submitted TIA refers to various reports and documents which have not been provided with the application assessment material.</p> <p><u>Action:</u> (a) Provide a copy of all documents and reports referred to in the submitted TIA, including the following: i. Coochin Creek Park Impact Assessment, prepared by SLR and dated 22 March 2022 ii. Traffic Impact Assessment, Coochin Creek Eco Park, 1807 Roys Road, Coochin Creek, prepared by SLR dated 21 September 2021</p>

	<p>iii. Coochin Creek – Proposed camping facility – Roys Road safety improvements – Minor Update to advice of 11 May 2023, prepared by Holland Traffic Consulting, dated 18 December 2023</p> <p>iv. Planning and Environment Court Judgement No. 1836 of 2022 between Comiskey Management Services Pty Ltd (ACN 115 254 307) (Appellant) and Sunshine Coast Regional Council (Respondent) on 20 December 2023.</p>
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Applicant's Response:

In response to Items 8-11, please refer to the Traffic Engineering Response, prepared by SLR Consulting attached in **Appendix F**.

In relation to Item 11(a)iv., please find attached the P&E Court Judgement as it is not incorporated into the SLR Consulting Response package. The P&E Court Judgement has been included in **Appendix G** of this response.

Item	Information Requested
Wastewater management	
12.	<p>Issue: The on-site wastewater plan proposes a package sewage treatment plant (STP) of 50kL size (minimum), a 100kL balance tank, 250kL wet weather tank and irrigation area of 2.5 hectares, located in the northwestern corner of the site.</p> <p>Action: (a) A revised On-site Wastewater Management Assessment Report (OSWMA) must be provided that addresses the following: i. clearly demonstrates that the proposed capacity can meet the needs of the development ii. how potential effluent spray irrigation to the adjacent strawberry farm has been mitigated iii. demonstrates that the borehole sampling undertaken for the report is sufficient to provide appropriate geotechnical and environmental context for informed decision-making iv. identifies when irrigation areas will be used and potential frequency rates v. includes a consideration of the infrastructure required to connect the development site with the STP. (b) The revised OSWMA should also include a plan that shows: i. the location of all STP infrastructure, such as tanks and pipes ii. clear distances from the STP and associated infrastructure from dwellings, property boundaries, water bodies, pathways, recreational areas and mapped vegetation areas iii. pipes and other infrastructure connecting the development area with the STP, demonstrating that mapped environmental areas have been avoided.</p>

Applicant's Response:

In response to Item 12, please refer to the Effluent and ASS Response, prepared by Gilbert & Sutherland (see **Appendix H**).

Item	Information Requested
Water Supply	
13.	<p>Issue: The Water Supply Report has used the 100 per cent average of approximate rainfall capture based on the analyses undertaken using hydrologic data from Peachester station.</p> <p>Action: (a) Explain the rationale for relying on rainfall data from the Peachester Station, noting that according to the Bureau of Meteorology, the Beerburum Station is located approximately 12.2 km from Coochin Creek, while the Peachester Station (also referred to as the Sunshine Coast Airport Station) is situated approximately 32 km away. (b) Amend the report to provide a more conservative estimate of water harvesting potential for the site, avoiding reliance on 100 per cent of the average captured rainfall.</p>

14.	<p>Issue: The Water Supply report has identified a range of water sources, including two existing dams, a well and rooftop harvesting.</p> <p>Action: (a) The well is located within the footprint of the proposed carpark. Demonstrate the measures that will be implemented to protect it from potential contamination, including runoff from impervious surfaces and vehicle parking areas. (b) Clarify how proposed recreational activities, such as fishing from the dam, can occur while the dam is also the main potable water source for the development. (c) Provide details, including drawings and plans, showing the extent of work required to ensure the dam is suitable for water capture. (d) Provide plans showing the extent of pipes and other infrastructure connecting the development area with the water supply that clearly shows that mapped environmental areas have been avoided.</p>
15.	<p>Issue: The Water Supply Report notes that water supply for grounds maintenance and firefighting has not been fully assessed. However, the Bushfire Hazard Assessment indicates firefighting water will be supplied by a private reticulation system, using a 250kL potable tank and a 288kL dedicated firefighting storage near the reception building. The Water Supply Report also states that during low dam levels, tank capacity may decrease, with external water deliveries triggered when levels reach 125kL.</p> <p>The Bushfire Resilient Communities Technical Reference Guide (October 2019) advises that an adequate static water supply should be provided in bushfire-prone areas without reticulated water to support emergency services response.</p> <p>Action: (a) If reliance on potable water for bushfire purposes is proposed, amend the Water Supply Report to consider bushfire needs as part of the storage and supply requirements. (b) Details regarding the water supply for bushfire protection, whether relying on the potable water network or alternative standalone systems, should ensure that: i. the proposal provides water tank(s) consistent with the minimum requirements outlined in the <i>QFD Technical Reference Guide</i> ii. due consideration has been given to the location of the water storage in relation to the most likely fire fronts on the site, as well as to the resistance of the water storage to the effects of radiant heat and direct flame. (c) Demonstrate water sources for grounds maintenance purposes.</p>

Applicant's Response:

In response to Items 13, please refer to the Effluent and ASS Response, prepared by Gilbert & Sutherland (see **Appendix H**).

In response to Item 14(a), please refer to the Water Supply Concept Plan attached in **Appendix I**. The existing well is within a proposed landscape area. It will be bunded around the perimeter to prevent contamination from surrounding areas.

In response to Item 14(b), the Master Plan has been amended (refer to **Appendix A**) so that fishing is only allowed in the northern most dam. The 2 dams used for potable supply source will not be used for fishing or recreational activities.

In response to Item 14(c), there are no earthworks proposed to modify the catchments of the dams to be used for potable water supply. The dams fill via their existing catchments.

In response to Item 14(d), please refer to the Water Supply Concept Plan (**Appendix I**) that indicates avoidance of the mapped environmental areas.

In response to Item 15(a), the 288kL fire tank located near the reception centre is dedicated solely to providing a water source for the hydrant serving the reception centre. It is filled once prior to the commencement of operations and may only require occasional top-ups from roofwater. As such, it does not place any demand on the potable water system. The fire hydrant shown near Cabins 35-38 draws only a minimal volume from the potable system, with a total demand of approximately 10kL.

In response to Item 15(b), water for bushfire protection has been provided in accordance with the Bushfire Management Plan at 2 locations, namely near cabins 35-38 and adjacent to the reception centre.

In response to Item 15(c), as per the Amended Master Plan attached in **Appendix A**, water supply for irrigation purposes will be sourced from the northernmost dam, which will be deepened.

Item	Information Requested
Waste	
16.	<p>Issue: The proposed use is likely to generate significant amounts of waste which will require adequate waste management provisions in terms of waste minimisation, storage, and collection.</p> <p>Action: (a) Provide an Operational Waste Management Plan that outlines the waste minimisation, storage and collection strategy for the proposal. (b) If Council-managed refuse collection services are to be used, provide evidence confirming that the Council supports, or has approved, the proposed arrangements.</p>

Applicant's Response:

In response to Item 16, please refer to the Waste Management Plan prepared by Comiskey Group and attached in **Appendix J**.

Item	Information Requested
Stormwater	
17.	<p>Issue: The submitted Stormwater Management Plan contains conflicting technical information and lacks several key components required for a comprehensive assessment.</p> <p>Action: (a) Provide a revised Stormwater Management Plan that addresses the following: i. provides clarity around which bioretention basins are saturated zone basins and which have been modelled as conventional. If basins draining to mapped wetlands are saturated zone basins, then compliance with PO7/A07 of the Council's Stormwater management code must be demonstrated. ii. provides details of the Mannings 'n' values used for the channel design noting that Council's Stormwater management code requires a minimum Mannings 'n' of 0.15 to be used.</p>

Applicant's Response:

In response to Item 17, please refer to the Engineering Response, prepared by Covey Associates attached in **Appendix L**.

Item	Information Requested
Flooding	
18.	Issue:

	<p>To achieve flood immunity, the Flood Emergency Management Plan (FEMP), states that proposed earthworks will ensure an area (10ha) will remain above the probable maximum flood (PMF) level (i.e. 3.8m AHD), and material will be used to fill other portions of the site that will increase the flood immunity broadly across the site.</p> <p>It is also understood that removal of a bund and the volume created above the standing water level in the proposed constructed waterbody is proposed to offset the loss of floodplain storage capacity resulting through the proposed filling of the site.</p> <p>Action: (a) Provide calculations undertaken in accordance with the Council Flooding and Stormwater Management Guidelines demonstrating that there will be no loss of active floodplain storage capacity during all events up to the 1 per cent AEP event. (b) Provide a Constructed Waterbody Design Report, prepared in accordance with the Council Planning Scheme Policy for Development Works and relevant State requirements for works within the coastal management district and waterway barrier works.</p>
19.	<p>Issue: The FEMP has considered flood modelling to determine the extent of flooding impact on the site to assist in confirming appropriate mitigation measures.</p> <p>Action: (a) Clarify whether the flood modelling used to prepare the FEMP has considered events coinciding with high tide conditions and assess the potential compounding impacts of such scenarios on site inundation and flood risk. (b) In relation to the 'shelter in place' strategy, the following information is required: i. demonstrate how a reliable water supply will be secured to meet hygiene and sanitation needs, as well as potable water requirements for a minimum of three days, in the event that standard potable water infrastructure becomes inundated ii. identify the location of the emergency helicopter landing pad and demonstrate that safe access is achievable, considering existing tree coverage and potential obstructions.</p>
20.	<p>Issue: The submitted FEMP refers to various reports and documents which have not been provided with the application assessment material.</p> <p>Action: Provide a copy of all documents and reports referred to in the submitted FEMP, including the BMT report Flood Assessment – 1807 Roys Road, Coochin Creek (Revision 3, 21 September 2021).</p>

Applicant's Response:

In response to Item 18, please refer to the Engineering Response, prepared by Covey Associates attached in **Appendix L** and the Waterway Barrier Works Assessment, prepared by 28⁰ South Environmental attached in **Appendix N**.

In response to Item 19(a), please refer to the Hydrology Response, prepared by Water Engineering Partners attached in **Appendix M**.

In response to Item 19(b)(i), neither the 250kL storage tank, the water treatment plant, nor the reticulation network shown on the attached Water Supply Concept Plan (refer to **Appendix I**) would be inundated during a 1% AEP event. The 250kL tank provides a minimum water supply of approximately five days.

In response to Item 19(b)(ii), the amended Master Plan (refer to **Appendix A**) identifies the location of the emergency helicopter landing area, shown as Item 28 in the legend.

In response to Item 20, please refer to the Hydrology Response which includes the Flood Assessment Report prepared by BMT (refer to **Appendix M**).

Item	Information Requested
Bushfire	
21.	<p>Issue: The proposed change application represents an intensification of a vulnerable use within a bushfire prone area.</p> <p>In the event of a bushfire, both bells Creek Road and Roys Road may be exposed to fire hazards arising from both similar and varying fire fronts. The Bushfire Management Plan (BMP) notes that the bushfire mitigation measures referenced in the report is not implied nor intended to advocate that site occupants remain on the site during a bushfire event, however a key measure in the submitted Bushfire Emergency Response Plan is for visitors, guests and staff to 'shelter in place' using the reception building.</p> <p>Action: (a) Demonstrate how the development complies with Assessment Benchmark 3 of the State Planning Policy 2017 relating to natural hazards, risk and resilience. (b) Provide further information to demonstrate how the site can be safely evacuated, considering measures to ensure effective emergency service access to the site during a bushfire event and confirms the capacity of Roys Road to provide safe and reliable passage, particularly considering potential fire threats that may affect the road corridor. (b) Demonstrate how on-site 'shelter in place' can be carried out in a manner that mitigates the risks to people and property (including visitor's property such as caravans) to an acceptable or tolerable level. In particular, provide further information regarding: i. how the proposed 'shelter in place' facility has the capacity to shelter all visitors, guests, pets (if allowed) and staff during peak periods (e.g., the park is above 80 per cent capacity) ii. how the proposed shelter in place facilities will provide adequate protection from exposure to potential flame contact, radiant heat flux, smoke and ember contact during a bushfire, having regard to the non-fatal and fatal thresholds of radiant heat flux exposure set out at Figure 5 of the Bushfire Resilient Communities document iii. the functionality of the 'shelter in place facility' in the event of a power failure iv. how vehicles and caravans remaining on site will not significantly increase the impacts of bushfire (e.g., exposure of LPG bottles to radiant heat).</p>

Applicant's Response:

In response to Item 21, please refer to the Bushfire and Ecology Response prepared by North Coast Environmental Services attached in **Appendix K** (inclusive of the Amended Bushfire Hazard Assessment and Management Plan).

Item	Information Requested
Ecology	
22.	<p>Issue: The ecological assessment notes that its scope was limited to the master plan area of the site and did not account for potential ecological impacts associated with the northern portion of the site, which is proposed to accommodate the STP, bushwalking tracks, potable water supply infrastructure, and recreational dams.</p> <p>Action: (a) As the proposal relies on development extending beyond the master plan area, provide a revised Ecological Assessment Report that considers a comprehensive ecological assessment of the entire site to identify and address all potential impacts on onsite ecological values. (b) The revised report must: i. draw on other technical assessments and interpret the results of such studies in relation to impacts on the significant ecological values within and adjacent to the site ii. not rely on habitat assessments alone and should include an appropriate level of fauna survey, particularly in relation to shorebirds.</p>

	<p>(c) The revised report should outline mitigation measures and recommendations that address the following, at a minimum:</p> <ul style="list-style-type: none"> i. noise and light generated by the campsites and cabins, recreational facilities and the proposed reception centre ii. prevention of waste, litter and fishing tackle entering surrounding ecologically important areas iii. management of domestic dogs, particularly in terms of impacts to wildlife/shore birds and pet waste entering ecologically important areas iv. management of access to Pumicestone Passage through the ecologically important areas adjacent the Roys Road esplanade v. impacts of increased watercraft activity on the banks of Pumicestone Passage vi. impacts of the increased built form and impervious area on the hydrologic regimes of surrounding ecologically important areas.
23.	<p><u>Issue:</u></p> <p>It appears that the proposed earthworks may directly impact on wetlands, native vegetation areas, natural waterbodies and riparian protection areas, and habitats within mapped ecological linkages, identified in the Council's environmental mapping layers and are directly adjacent to the wetland ecosystems protected in the Pumicestone National Park.</p> <p><u>Action:</u></p> <p>(a) Provide an amended Ecological Values Statement that incorporates the Operational Works (OPW) component of the application.</p> <p>(b) At a minimum, the updated report must assess both the direct and indirect impacts of the proposed earthworks to enlarge the dam and to develop the northern extent of the site. This includes an evaluation of how the proposed OPW associated with the northern dam may affect the hydrologic regime of onsite wetlands and waterways.</p>

Applicant's Response:

In response to Item 22 & 23, please refer to the Bushfire and Ecology Response prepared by North Coast Environmental Services attached in **Appendix K** (inclusive of the Amended Ecological Values Report).

In relation to Item 22(c) specifically, we provide the following response:

- (i) Noise and light generated by the campsites and cabins, recreational facilities and the proposed reception centre is addressed in the Amended Environmental Amenity Report, prepared by MWA Environmental (**Appendix C**).
- (ii) Waste considerations are addressed in the Waste Management Plan, prepared by Comiskey Group (**Appendix J**).
- (iii) Domestic dogs will not be permitted in the eco-resort.
- (iv) Management of access to the Pumicestone Passage is controlled as per the Operational Management Plan, prepared by Comiskey Group (**Appendix D**).
- (v) The increased watercraft on the passage will predominantly be non-powered like kayaks, SUPs etc, which will not cause damage to the existing banks. Any additional powered watercraft would be subject to the existing boating rules in the Pumicestone Passage that are designed to limit speeds and protect the banks of the passage.
- (vi) Development will be undertaken in accordance with the Stormwater Management Plan, prepared by Covey Associates (**Appendix L**) that will include measures for treating stormwater before leaving the site and maintaining hydraulic regimes.

Item	Information Requested
Acid Sulfate Soils	
24.	<p>Issue: The submitted Acid Sulfate Soils Assessment report appears to have not been prepared in accordance with the National Acid Sulfate Soils Guidance – Sampling and Identification Methods Manual, in relation to the number of boreholes, location of boreholes and depth of boreholes.</p> <p>Action: (a) Provide a revised Acid Sulfate Soils Assessment report and Management Plan, which provides an acceptable investigation in accordance with the National Acid Sulfate Soils Guidance – Sampling and Identification Methods Manual. (b) Where dewatering is proposed onsite, provide a Dewatering Assessment and Management Plan which addresses the amount of dewatering, and any associated treatment train required for treatment.</p>

Applicant's Response:

In response to Item 24, please refer to the ASS Response, prepared by Gilbert & Sutherland (see **Appendix H**).

Item	Information Requested
Further information / materials to be provided	
25.	<p>Action: (a) Provide an updated masterplan that addresses the following: i. purpose of parking areas and allocated parking areas for each cabin/camping site ii. landscape screening areas iii. firebreak trails iv. staff accommodation v. internal road widths and dimensions. (b) Provide a detailed site plan showing the location of: i. all proposed infrastructure required to support the proposal such as STP infrastructure, rainwater and firefighting tanks, commercial water treatment plant and waste collection area ii. any jetties or pontoons or other infrastructure along the foreshore with the Pumicestone Passage iii. pedestrian pathways and proposed connections to external areas iv. emergency vehicle access areas (in the circumstance Roys Road is unusable).</p>
26.	<p>The subject site is encumbered by a range of easements, including two easements in favour of the Council over the dams in the northern portion of the site and an access easement over Lot 7 on SP106174, connecting the site to Roys Road.</p> <p>Action: (a) Confirm that the proposed development will not impede the ongoing use rights granted under the existing easements. (b) Provide details of the proposed access easement treatments to ensure it is appropriately designed to accommodate the anticipated traffic volumes, including an access design that complies with Section 5 of the Qld Fire Hydrant and Vehicle Access Guidelines 2019.</p>
27.	<p>Action: (a) Provide a breakdown of anticipated accommodation numbers, including the number of beds per cabin and the location and configuration of permanent staff accommodation facilities. (b) All submitted information lodged in response to this information request should adopt a conservative 'worst-case scenario' approach, assuming the development operates at full capacity and either: i. be prepared or authorised for release by a Registered Professional Engineer of Queensland (RPEQ) for matters relating to traffic, water, wastewater, civil and earthworks and stormwater; or</p>

	ii. be prepared by a suitably qualified expert with demonstrated experience in the relevant field for matters relating to bushfire, ecology, noise, air quality.
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Applicant's Response:

In response to Item 25, please refer to the Amended Site Master Plan (**Appendix A**) that incorporates the details requested. For clarity, an additional plan has been provided that is an overall site plan.

In response to Item 25(a)(i), the carpark at the entry to the eco-resort is designated for check-in, staff, and visitor use. Each cabin is provided with an uncovered car space in accordance with the Amended Master Plan. In addition, car parking for each site is contained within the individual site boundaries, consistent with the typical site arrangement sketch shown on the Master Plan.

In response to Item 25(a)(ii), the Landscape Concept Plan prepared by Cusp identifies designated landscape screening areas (refer to **Appendix B**).

In response to Item 25(a)(iii), firebreak trails are clearly identified on the Amended Master Plan (labelled 26 on the legend).

In response to Item 25(a)(iv), staff accommodation are labelled on the Amended Master Plan (labelled 24 on the legend).

In response to Item 25(a)(v), internal roadway widths have been shown on the Amended Master Plan.

In response to Item 25(b)(i), site infrastructure has been shown on the Amended Master plan, and on the attached Water Supply and Sewer Concept Plans (refer to **Appendix I**).

In response to Item 25(b)(ii), only infrastructure contained within the subject site has been shown on the Amended Master Plan.

In response to Item 25(b)(iii), Pedestrian pathways within the site are shown on the Amended Master Plan. There are no proposed connections to external areas.

In response to Item 25(b)(iv), emergency vehicle access areas for the site are the helicopter landing area and existing jetty shown on the Master Plan, as well as via the existing public boat ramp to the west of the development site.

In response to Item 26(a), the developer has confirmed that the proposed development will not impede the ongoing use rights granted by the existing easements.

In response to Item 26(b), existing Easement B on SP106174 within Lot 7 on SP106174 is an access easement in favour of the development site, providing access to Roys Rd. As shown on the Amended Master Plan, an 8m wide access driveway will be constructed within this easement, which will accommodate both anticipated traffic volumes for the development and provide access compliant with the minimum requirements of the Qld Fire Hydrant and Vehicle Access Guidelines 2019 (min requirements 3.5m wide, 4.8m high, 15t).

In response to Item 27(a), the Master Plan identifies the number of beds per cabin as well as the location of the permanent staff accommodation facilities.

In response to Item 27(b), this information request incorporates detailed responses prepared by qualified specialists, each addressing matters within their respective professional areas of expertise.

3.0 SUMMARY

In accordance with Section 13.2 of the Development Assessment Rules, we hereby provide our formal response to the Information Request issued on 9 July 2025 for development application MBN25/959. We request that the Department proceed with the assessment of the application based on the submitted material. We will now commence public notification. Should you wish to discuss any element of our response in further detail, please contact me on (07) 5441 2188.

Yours faithfully,



Blake Bell BRTP, M.P.I.A., CPP, MDIA
Director/Principal Town Planner
MURRAY & ASSOCIATES (QLD) PTY LTD

Amended Site Master Plan

Prepared by CUSP

Landscape Concept Plan

Prepared by CUSP

Amended Environmental Amenity Report

Prepared by MWA Environmental

Operational Management Plan

Prepared by Comiskey Group

Economic Need Response

Prepared by Location IQ

Traffic Engineering Response

Prepared by SLR Consulting

P&E Court Judgement

Effluent and ASS Response

Prepared by Gilbert & Sutherland

Water Supply & Sewer Concept Plans

Waste Management Plan

Prepared by Comiskey Group

Bushfire and Ecology Response

Prepared by North Coast Environmental Services

Engineering Response

Prepared by Covey & Associates

Hydrology Response

Prepared by Water Engineering Partners

Waterway Barrier Works Assessment

Prepared by 28⁰ South Environmental