

The Assessment Manager  
City of Gold Coast  
PO Box 5042  
GCMC 9729

Dear Sir / Madam,

We write in regards to the development application for Material Change of Use at 263 Repeater Station Road, Springbrook and wish to express our objection to this application. We believe the application is inconsistent with the City Plan, the rural classification of the area and the surrounding World Heritage Nature reserve. We believe this industry is unsustainable and results in an unnecessary depletion of a critical natural resource. Allowing such an application to be approved will set a devastating precedence, potentially contribute to the demise of the ecology of Springbrook, and impact the natural beauty that attracts environmental conservationists to live and preserve the area and many tourists from across the globe that wish to take in its beauty. The details of this application are as follows:

Application: MCU201800495  
Description: RURAL INDUSTRY  
Code: MATERIAL CHANGE OF USE  
CLASS: IMPACT  
LODGED: 27.04.2018  
FILE PART NUMBER: PN125748/01/DA2

Our family relocated to Springbrook to enjoy the peace, tranquility and beauty that makes Springbrook so unique. We request that council consider our objection on the following grounds.

### **1. Proposed development is inconsistent with rural use**

It is acknowledged by the applicant and his town planner, Michel Group Services that the proposed development is not a listed use relevant to a rural property. As would be well understood the fact the proposed use is not in the City Plan requires the proposed application to demonstrate that it does not impact the community negatively, or that any impacts are satisfactorily mitigated. Further to this, the key objectives for rural areas as defined by the City include the preservation of landscape character including topographical features, maintaining nature conservation values and the promoting the conservation of wildlife and wildlife habitats as well as protecting rural areas from encroachment by urban activity. In light of these requirements and objectives we believe there will be substantial negative impacts to the community, tourism, road safety, waste sustainability and the unique ecology of Springbrook, without any effective mitigation and therefore it the proposed application is inconsistent with rural use, the City Plan and should not be approved in any form.

### **2. The impact to the ecology of Springbrook**

It is noted that this material change of use application is the second on record for this property. The associated application as referred to within this application is MCU 201601209. Vegetative clearing occurred at the proposed development site as detailed within this earlier application. Whilst it is not claimed that the applicant performed the early vegetation clearing in preparation for this recent application, we believe these early works should certainly be considered so as to not set a precedent whereby potentially related actions are not adequately considered within such an application, particularly when assessing whether to introduce a commercial operation on a rural property within a World Heritage Nature reserve.

It is noted that over the past 20 years a change in the Springbrook ecology has occurred. Whilst the rainforest has continued to recover from clearing in the 1960s a reduction of certain species has been observed, notably a significant reduction in Echidnas and presumed extinction of Quolls on the mountain. Establishing any industry on the mountain that requires ongoing truck movements will almost certainly result in a further reduction of species that come into contact with the

roadways. Since 2017 we have resided at our property at Springbrook and have been witness to much roadkill including Bandicoots, Possums and Pademelons with many deaths go unreported. On a number of occasions we have also found the dead or injured animals to have babies in the mother's pouch. By the time these are found most subsequently die with many dying due to a lack of prompt action. It is almost certain that should more trucks be introduced into the area that more animals will be hit and more will be left in the pouch to die, including by trucks that are typically adverse to stopping their heavy load.

The extraction of water from a bustling habitat to presumably bottle and sell within single use plastic drink bottles conflicts with recent movements across the State, Country and globe that aims to improve our environmental conservation efforts. It should be noted that at present there are two properties established at Springbrook with water extraction currently operating. In total they extract 112,000L of water each day (4 trucks at 28,000L). On the presumption that the majority of water is sold in 500mL bottles, this equates to the creation and subsequent disposal of 224,000 single use bottles each day, equating to a dreadful 81.5M bottles/ year. Any further promotion of such an industry from Springbrook would be appalling.

A review of the applicant's expert studies finds no impact assessment for such a development would have over a period of 50-100 years. It is our belief that short-term or isolated studies that appear to not conclusively demonstrate the effect on neighbouring properties, acoustic impacts on species, scouring of vegetation and underground water movement should not be considered satisfactory.

It is noted by the applicant The City Plan provides a strategic framework to ensure appropriate and sustainable development for the life of the City Plan. The specific outcomes identified by the applicant include reference to Tourist Economy, Natural Landscape Areas, Nature Conservation, Landscape Character and Environmental Health and Amenity. It is our assessment that no part of the application references a desirable outcome. Rather, it appears that the majority of responses involve the applicant asserting that he will sufficiently conceal his activity thus mitigating the negative impacts associated with the proposed development. Even with the greatest of efforts it will be impossible to hide the industrialisation of this rural area once these heavy trucks are travelling throughout the Springbrook hinterland resulting in risk to propagation and life for any wildlife that may be near or in their path.

### **3. Economic Analysis**

It is unclear as to how the applicant wishes to claim this industry produces economic benefit. It is noted within Part 2, 5.14 that the applicant states "No processing of the water resource will occur on-site. Simply the ground water will be extracted into a holding tank or directly into the transport truck to be packaged/processed off site" however within the applicant's Acoustic Works report it states "Water will be processed by a filtration system before being pumped into transport trucks". Whilst it has been claimed by the applicant that he wishes to provide water to the local community there is no detailed design on the potential filtration system and / or requirements to enable the extracted ground water to be legally sold as potable. Regardless of the claim it is unnecessary and unsustainable to establish a water supply industry within one of Queensland's highest rainfall areas when any ongoing water shortages can more sustainably be resolved through the purchase of a rainwater tank for the cost of approximately two water deliveries. To properly assess the economic impacts of introducing such an industry, a study should be conducted to determine the impact on property values and tourism as a result of the industrialisation of a rural area, the ongoing cost of investment to rectify ecological damages and road maintenance costs.

As noted earlier it should also be noted that at present there are two properties at Springbrook already established for water extraction. In total they extract 112,000L of water each day. On the presumption that the majority of water is sold in 500mL bottles at \$2/ bottle then a gross total of daily sales equates to \$448,000 (\$116.5M/ year). There appears to be no economic reasoning as to why we would want to expand an industry that sees a natural resource extracted at minimal cost and then sold to large corporations including Coca-Cola as with zero benefit to the community or

City in which this industry operates. Providing approval to further this industry will almost certainly result in investment from those wishing to maximise personal and big business wealth in an area that should be respected in accordance with its World Heritage Nature classification.

#### **4. Noise disturbance**

The proposed noise disturbances are unreasonable and inconsistent with the Springbrook area.

It is noted that the applicant indicates he wishes to extract ground water, pump into a filtration system, process and then pump into trucks before commencing a round trip down the mountain and then back up again. It is noted that there is no detail design on the potential filtration system or site recordings on the sound of filling a tank/ truck in the proposed structure therefore any analysis of sound baffling effectiveness on the site cannot be assessed and should not be approved. It is reasonable to presume however that introducing this process even just once a day will have an impact on the tranquility of the area. It is understood the vast range of residents and bed and breakfast clientele live or frequent Springbrook for the peace that the local fauna and flora bring. Introducing even a single truck with a loaded weight of up to 35 tons potentially requires heavy braking to make its way down the mountain or conversely if unloaded then heavy acceleration will be required to get up the mountain, having a significant impact. As is interpreted from the Acoustic Works report it is without doubt that such a movement would be noticeable and disturbing to those in the streets in which it travels and potentially those in the broader proximity. The proposed operation between 6.30am and 5pm, Monday to Friday and 6.30am and 10am, Saturday (Michel Services Group, 26.04.18, 17161, 3.0) involving 16 truck movements each day is horrible to consider however if it did proceed then a truck will be able to be heard almost every half an hour. Depending on one's location they may hear the truck approach from a distance, pass, and then proceed into the distance as will be the case for our family if this application is approved.

It should be noted that the applicant performed sound testing between 11.08.17 and 18.08.18 during a period in which a presumably unauthorised generator was continuously operating at a nearby property (per council's noise complaint records in 2017). The base level of sound recorded would therefore be presumed to be much lower than that identified by the Acoustic Works report making any new noises more noticeable.

#### **5. Tourism**

As is understood for good reason, thousands of local, interstate and foreign tourists make their way to Springbrook every week to witness the bustling wildlife and waterfalls that make Springbrook so special. The industrialisation of such an area evidenced by the water extraction trucks on the narrow roads will undoubtedly cause concern and be unappealing to many of these tourists that visit. It is reasonable to conclude that a downturn in tourism could also occur if those visiting find the falls to be of lower than expected flow due as is expected to occur as a result of commercially drawing water from an integral point of supply. Any downturn in tourism in Springbrook could have a direct and strong impact on those wishing to visit the City.

It is noted that the proximity of natural attractions appears to be underemphasised in the applicant's submission. It should be well understood that the surrounding areas not only include rural properties, bushland but Natural Bridge, Twin Falls, the 'Best of All Lookout' including the ancient 2000 year old arctic beach trees, multiple walking tracks as well as World Heritage Nature Reserves and National Parks. Visitors to any of these attractions may encounter the site and/or a truck movement associated with this site should this application be accepted.

As noted earlier to properly assess the full economic impacts of introducing such an industry into this area an impact assessment focusing on this issue should be conducted with conclusive evidence demonstrating the impact this extraction will have on the natural attractions.

#### **6. Water resources**

The impacts of water extraction are vast with potential impacts on local springs, creeks and the iconic waterfalls at Springbrook. In response to the proposal to commercially extract water at 263 Repeater Station Road, Springbrook, an industry expert has advised “this water will be drawn from wells in the Hobwee Basalt, which is a series of lava flows near the top of the Mount Warning volcano. Seasonal rain fills the porous spaces in the basalt and flows down under gravity to emerge in springs, especially at the impermeable rhyolite, to feed the creeks that form the waterfalls. In the low rainfall months of May through November, the springs are the main supply to the waterfall creeks. Drawing water at the proposed rate for commercial purposes will reduce the water discharged at springs especially during the low rainfall months. The drill holes for this application are situated in a relatively confined topographic bowl which is the source for the creek that flows through Koonjewarre and the Mouse’s House then to Twin Falls. Water flow in this creek is likely to be substantially reduced in the low rainfall months if water is pumped out at the application rates.”-There appears to be no supporting evidence within the applicant’s own specialist report, prepared by Douglas Partners that supports the claim that the proposed water extraction would not interfere with the local watercourses, springs and falls.

It has been identified by SEQ that the median annual rainfall is approximately 40% less than the volume cited within the applicant’s specialist report. The Bureau of Meteorology whole of records for the Springbrook rainfall stations (040607 & 040848) show there to be a median of 1838mm rainfall per year. Further to this, is a record of the annual rainfall being as low as 1071mm. These disparities strongly indicate that the groundwater recharge rate provided by the applicant is inaccurate and is not an indication a recharge rate that could be found during or at all times during the dry season. Of great concern is the lack of intention expressed in the application to cease water extraction during the six month dry season (May to October) where the monthly median rainfall is 67mm, approximately a third of the rainfall experienced in the alternate six month period. Extraction of any volume of water that is not subsequently reticulated back into Springbrook is opposed. As raised by SEQ there appears no indication that the applicant is intending on operating only in the wet seasons of wet years, but rather he has indicated continuous operations irrespective of the natural fluctuations. It is our understanding that council has records or access to records for the existing commercial water extraction sites. We request these records are reviewed in consideration of this application.

SEQ note that the supporting material provided by the applicant does not demonstrate compliance with 3.7.5.1 Specific Outcomes in the Strategic Framework, Gold Coast City Plan. Their subsequent recommendations despite acknowledging that no consideration has been given to the impact to groundwater dependent ecosystems appear to be based on the assumption that it was mandatory that an approval of some extent must be granted. Considering the expert opinion, it is our understanding that this proposed depletion of a natural resources that sustains an ecological habitat and is precious to the community and tourists alike is in no in line with the City Plan. It is crucial that this application is declined and a precedent not set that has wide spanning and serious impacts.

## **7. Traffic impact**

The addition of any further truck movements to and from Springbrook is of great concern. As identified the applicant’s own specialist report (Rytenskild), “there are some sections of the road which narrow to less than the ideal width for two vehicles” therefore introducing a heavy vehicle will only exacerbate this issue. Considering there are only two\* routes to and from Springbrook, one of which can be used by heavy trucks, the allowance of any additional truck movements will have a noticeable impact. The pavement maintenance associated with these routes is difficult, costly and does not occur as often as would be preferable. Performing maintenance works on these routes requires the closure of one of the two lanes limiting the ability for traffic to flow in both directions, with presumably considerable costs associated with the traffic management. Introducing trucks with a weight of up to 35 tons will presumably further exacerbate the existing degradation of the road, accelerate maintenance requirements and increase the delays caused to residents and tourists. Whilst it is noted the City will not be directly responsible for the repairs of State roads, the funding required from other levels of government may result in the City attracting less State/

Federal investment for local roads that could enhance the City. In the interim City residents and visitors will be forced to use roads that are substandard.

As noted by DTMR there are a number of heightened safety risks (limited sight distances, narrow single lanes with no shoulders, side hazards, inadequate overtaking lengths and opportunities etc.) associated with heavy truck movements. It is noted within the applicant's traffic impact assessment report that the installation of convex mirrors is recommended to mitigate the risk of collision between the proposed water truck and other vehicles or active travelers. This treatment is not supported by Council, with any existing signs to be removed moving forward thereby leaving this risk untreated. The applicant's, Rytenskild report states "one heavy vehicle movement per hour in each direction will not have a significant impact" however considering there are 2,268 cars that travel along Nerang Murwillumbah each day on average (per the AADT Segment Analysis Report Road Section 2015). On the basis that 80% of these vehicles travel between 6am and 6pm, on average there are approximately 151 vehicles per hour that may encounter and get stuck behind one of the trucks associated with this development. Even a fraction of the proposed truck movements could have a significant impact on a driving experience. As a driver of this route (Springbrook to Nerang) each day I regularly see vehicles overtake on solid or double lines and overtake at the limited overtaking opportunities even when there are vehicles approaching at high speeds. Providing an approval to this application in any form will result in slow moving heavy trucks almost certainly causing significant frustration and leading to unsafe traffic movements on roads that DTMR note have inadequate overtaking lengths and overtaking opportunities. It is reasonable to foresee that multiple vehicles may attempt to travel far distances to get ahead of the slow moving trucks considerably enhancing the risk of "head-on and run-off crashes" as noted by DTMR. On roads that are already populated with memorial crosses and death statistic signage, I urge council to note the potential gravity of the consequence.

For the reasons above we do not believe this application to be in the interests of Springbrook's ecology or of any benefit to ourselves, the community or the City. We urge the assessor to decline any approval of commercial water extraction at 263 Repeater Station Road, Springbrook.