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Australian Coastal Society Ltd

PO Box 65, Flinders University, Bedford Park SA 5041

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17 December 2013

Department of Natural Resources and Mines  
Robina  
PO Box 4297  
Robina Town Centre 4230

Dear Sir/Madam

**Re: Applications for Permanent Road Closure Sections of Pacific Parade Bilinga to Tugun**

I am writing with regard to the recent applications for road closures along the Tugun-Bilinga foreshore on the southern Gold Coast. On behalf of the Australian Coastal Society I wish to express our strong objection to this request.

This objection is not just related to the local application, but also to additional applications of this nature that are expected to be lodged by nearby residents in the near future, and to all similar applications within the State of Queensland.

The primary purpose of this application is to allow for the land to be incorporated into the adjacent freehold allotment. To allow the transfer by stealth of public land into private ownership would create a dangerous precedent and is contrary to the principles of coastal hazard management and the maintenance of public access to the coast as incorporated into the plans, policies and legislation relevant to coastal management at the local and State government levels.

The *State interest- coastal environment* detailed on page 47 of the recently formalised State Planning Policy (SPP) highlights the need for “*maintaining or enhancing opportunities for public access and use of the foreshore*” and the avoidance of adverse impacts on coastal processes, coastal resources and scenic amenity of natural coastal landscapes. Thus the loss of this public land would be in contravention of the intent of the SPP with regards to management of the coastal zone.

The SPP State interest - natural hazards is also relevant to this proposal, as the identified road reserve is located within the erosion prone area identified by the City of Gold Coast. The area in question is periodically affected by severe storm events, and was almost completely eroded during the storms of June 1998. The draft SPP Guideline for [Coastal Hazards](#) identifies walking trails and coastal reserves as preferred uses of land within erosion prone areas, and supports the use of buffer zones (Policy 5) for management of erosion hazards. The existing reserve provides such a buffer and provides for flexibility of future management options in the face of enhanced coastal hazards.

In addition to the State government concerns that should be raised by this proposal, there are also local planning issues that must be considered. The area in question under the road closure proposal is currently

dedicated as a road reserve, and it is the stated intent of the City of Gold Coast Council to incorporate this land into the Oceanway walking and cycle path. Beachfront residents have submitted this application in order to legalise their encroachment on this land, which is in contravention of a previous direction to remove all structures related to their continued occupation of public land.

As trustees of this land, the City of Gold Coast Council at their meeting on the 12<sup>th</sup> of December voted unanimously to oppose the application for road closure. At the time of writing the minutes for this meeting were not available online, although the decision was made on the advice from the City Planning Committee which is available at the below address and identifies numerous concerns with the proposed road closure. Notes provided by the City Planning Committee to Council for their consideration of this issue are available at the following link.

[http://www.goldcoast.qld.gov.au/documents/ma/Planning\\_671\\_11\\_DECEMBER\\_2013\\_AGENDA\\_\(PART\\_1\).pdf](http://www.goldcoast.qld.gov.au/documents/ma/Planning_671_11_DECEMBER_2013_AGENDA_(PART_1).pdf)

Given the numerous concerns raised, I trust that the Department of Natural Resources and Mines will also oppose the proposed application for road closure on the Bilinga beachfront, and all similar applications in the future.

If you would like to discuss any of the issues raised in this letter further, please do not hesitate to contact me at [nick.harvey@adelaide.edu.au](mailto:nick.harvey@adelaide.edu.au) or on 08 8313 0629.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Harvey', written in a cursive style.

PROFESSOR NICK HARVEY  
*President, Australian Coastal Society Ltd*