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7 January 2026

Our Ref: 2025-0031 Wonga Beach Resort

Chief Executive Officer
Douglas Shire Council
PO Box 723
MOSSMAN Qld 4873

To: enquiries@douglas.qld.gov.au (By Email)

Attn: Jenny Elphinstone (Senior Planning Officer),

Response to Action Notice Regarding the Combined Application seeking a Preliminary Approval including a Variation Request Seeking Use Rights Consistent with the Tourist Accommodation Zone and Development Permit for a Material Change of Use for a Resort Complex at 18 Oasis Drive, Wonga Beach (Lot 2 on SP259953) – Council ref: CA 2025_5878/1(Doc ID 1341260)

Kelly Reaston Development and Property Services has been engaged by 18 Oasis Street Pty Ltd (the Applicant). We make reference to the Action Notice received from Douglas Shire Council dated 5 January 2026 and provide the following response:

Item 1 – Floor Area Calculations

The areas referenced by Council on Drawing A112 and A113, are shown and detailed on Drawing A115. This plan has been reattached, with the relevant areas identified for clarity.

We do not agree that all areas identified by Council should be included in the calculation of additional use area. The Fees and Charges Schedule states that “the area will be calculated by the use area containing activities integral to the development.” Back-of-house (BOH) areas, circulation spaces, and link passages / passage ways are ancillary and functional in nature and do not contain activities integral to the use. These areas should therefore be excluded from the use area calculation.

Further, as previously outlined in our email dated 19 December 2025, we maintain that the lower variation application fee is the appropriate fee in this instance. The proposal does not



seek to introduce bespoke planning controls. Rather, it involves a limited and clearly defined variation within the existing planning framework. On this basis, the application does not warrant classification at the higher fee threshold, and we request that this be reflected in Council's fee calculation.

Item 2 – Non-devolved ERA

We confirm that the Non-devolved ERA will be pursued separately and at a later stage.

Should you require any further information, please do not hesitate to contact Kelly Reaston on 0400 974 688 or at kelly@kellyreaston.com.au.

Kind regards

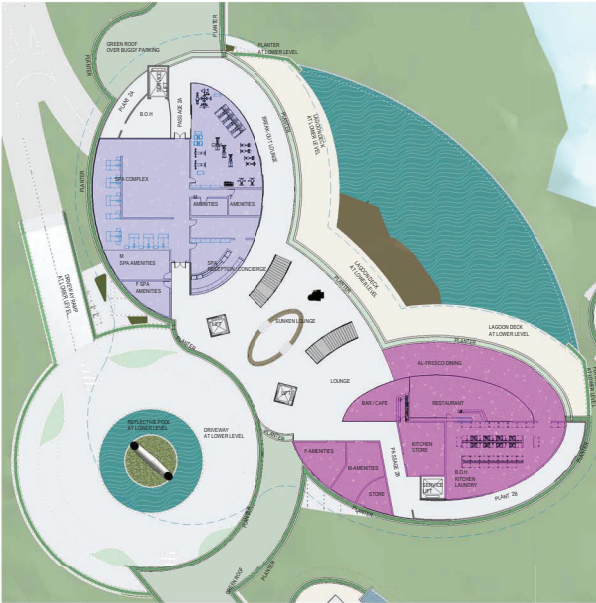
A handwritten signature in black ink, appearing to be 'KR' with a flourish, enclosed within a light grey rectangular border.

Kelly Reaston | Director

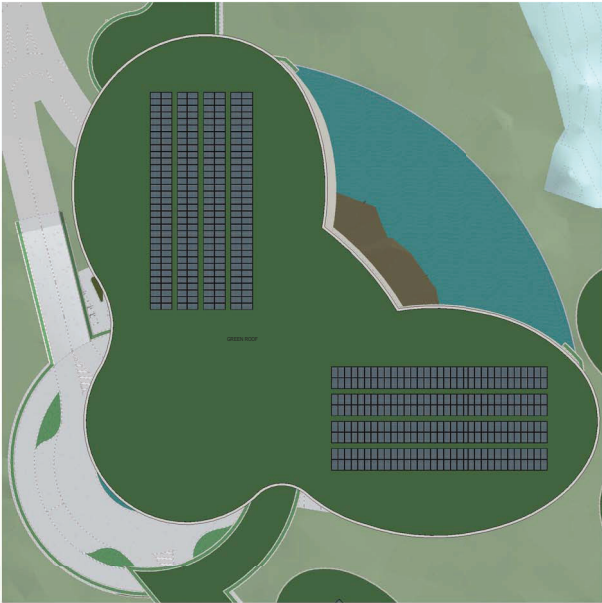


CENTRAL FACILITY BUILDING_ AREA SUMMARY GROSS BUILDING AREA (GBA) & GROSS FLOOR AREA (GFA)

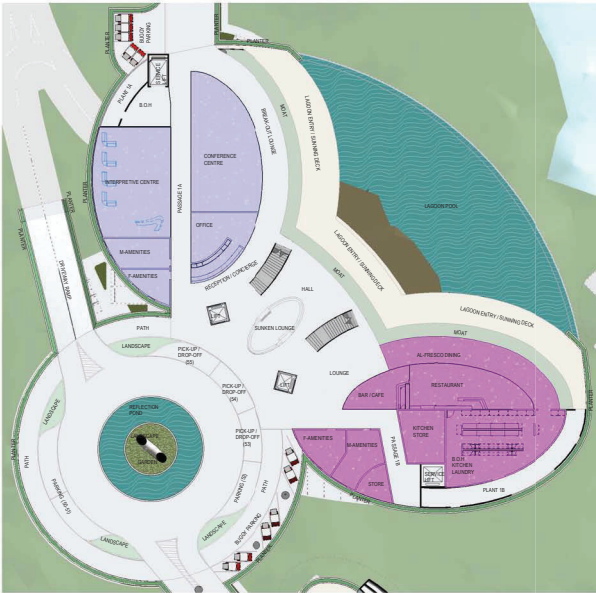
CATEGORY	LEVEL	ZONE NAME	GBA (sqm)	GFA (sqm)
CIRCULATION	LU	ENTRY LOBBY	593	-
	LU	LOGOON POOL TANK	55	-
	LU	POOL PLANT ROOM	55	-
	LU	WASTE RECYCLING	48	-
			751 m²	
VEHICLE CIRCULATION	LU	PARKING SPACES	1889	-
VEHICLE CIRCULATION	LU	DRIVEWAY ROUNDABOUTS	1783	-
			3672 m²	
CIRCULATION	L1	RECEPTION CONCIERGE	26	26
ADMIN/OFFICE	L1	OFFICE	56	56
ADMIN/OFFICE	L1	CONFERENCE CENTRE	194	194
CIRCULATION	L1	LINK PASSAGE 1	124	-
ADMIN/OFFICE	L1	INTERPRETIVE CENTRE	192	192
AMENITIES	L1	AMENITIES	72	72
SERVICES	L1	B.O.H	38	-
SERVICES	L1	PLANT-1A	30	-
LIFESTYLE	L1	BREAK-OUT LOUNGE	121	-
			47	-
LIFESTYLE	L1	SUNKEN LOUNGE	47	-
CIRCULATION	L1	CIRCULATION HALL	343	-
LIFESTYLE	L1	LOUNGE	136	-
FOOD/BEVERAGES(F+B)	L1	BAR/CAFE	47	47
FOOD/BEVERAGES(F+B)	L1	RESTAURANT	107	107
FOOD/BEVERAGES(F+B)	L1	AL-FRESCO DINNING	115	-
FOOD/BEVERAGES(F+B)	L1	BOH KITCHEN LAUNDRY	169	169
FOOD/BEVERAGES(F+B)	L1	KITCHEN STORE	55	55
SERVICES	L1	PLANT-1B	90	-
STORES	L1	STORE	21	21
AMENITAS	L1	PUBLIC AMENITIES	86	86
CIRCULATION	L1	LINK PASSAGE 2	69	-
			815	-
WATER BODIES	L1	LAGOON POOL	815	-
LIFESTYLE	L1	SUNNING DECK / ENTRY	393	-
GARDEN AREAS	L1	MOAT	174	-
			3520m²	1130 m²
VEHICLE CIRCULATION	L1	DRIVE ENTRY & PICK-UP DROP-OFF PLATFORM	1265	-
			1265 m²	
LIFESTYLE	L2	SPA RECEPTION	26	26
LIFESTYLE	L2	SPA COMPLEX	315	315
AMENITIES	L2	SPA AMENITIES	70	70
LIFESTYLE	L2	GYM	136	136
AMENITIES	L2	GYM AMENITIES	46	46
CIRCULATION	L2	PASSAGE	56	-
SERVICES	L2	B.O.H	38	-
SERVICES	L2	PLANT-2A	30	-
LIFESTYLE	L2	BREAK-OUT LOUNGE	160	-
			47	-
LIFESTYLE	L2	SUNKEN LOUNGE	47	-
CIRCULATION	L2	CIRCULATION HALL	344	-
LIFESTYLE	L2	LOUNGE	142	-
FOOD/BEVERAGES(F+B)	L2	BAR/CAFE	47	47
FOOD/BEVERAGES(F+B)	L2	RESTAURANT	107	107
FOOD/BEVERAGES(F+B)	L2	AL-FRESCO DINNING	115	115
FOOD/BEVERAGES(F+B)	L2	BOH KITCHEN LAUNDRY	169	169
FOOD/BEVERAGES(F+B)	L2	KITCHEN STORE	55	55
SERVICES	L2	PLANT-2B	90	-
STORES	L2	STORE	21	21
AMENITAS	L2	PUBLIC AMENITIES	86	86
CIRCULATION	L2	LINK PASSAGE 2B	69	-
			2169 m²	1215 m²
TOTAL			11377 m²	2345 m²



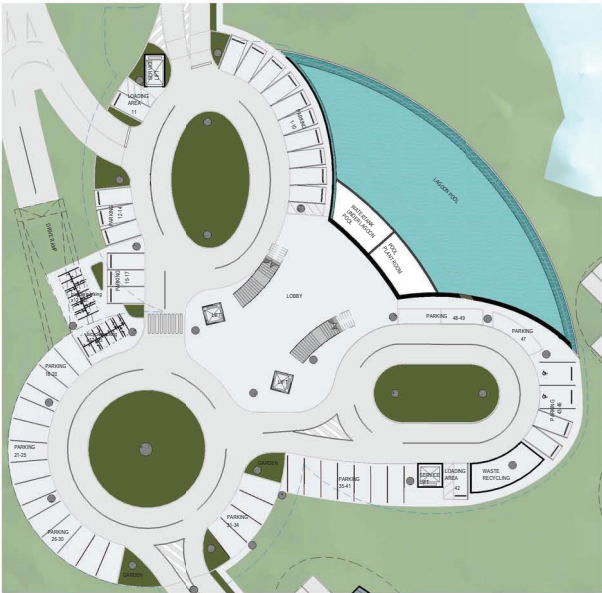
LEVEL 2 1:400



ROOF 1:400



LEVEL 1 1:400



UNDERCROFT 1:400

CENTRAL FACILITY BUILDING_ AREA SUMMARY

WONGA RESORT

WONGA BEACH, QLD

CENTRAL BUILDING AREA SCHEDULE

Scale

Date 05/12/2025

TOWN PLANNING



CWA
Charles Wright Architects

Drawn by: [Name]
Checked by: [Name]
Approved by: [Name]
Date: [Date]

1: 1:1000 (1:1000)
1: 1:1000 (1:1000)

JOB NO.

WG01

DRAWING NO.

A115

REV

SD2

10/12/2025 11:28:27 AM