

Our Ref HRP16299
Contact Group Legal

Cardno (Qld) Pty Ltd
ABN 57 051 074 992

21 December 2017

Kuranda Region Planning Group
Recreation Centre
KURANDA QLD 4881

Attention: Mr Jo Martin
Mr Steven Nowakowski
Ms Nadine O'Brien

Delivery via email: info@kurandaregion.org
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Dear Mr Martin, Mr Nowakowski and Ms O'Brien,

Kuranda Region Planning Group – Public Claims in relation to Cardno's Professional Conduct

I refer to email correspondence issued by the Kuranda Region Planning Group ('KRPg') on 18 December 2017 ('the correspondence') relating to a Development Application prepared by Cardno and lodged with Mareeba Shire Council ('Council') in relation to land at 112 Barnwell Road, Kuranda ('the development application'). For reference and completeness I note that a copy of this correspondence remains publicly available on KRPg's website (as shown in **Attachment A**).

Within this correspondence, KRPg has accused Cardno of:

- a) Incorrectly describing the proposed development to which the development application relates, specifically in relation to the calculation of gross floor area;
- b) Incorrectly identifying the assessment process applicable to the development application; and
- c) Intentionally providing false or misleading information as part of the development application.

The claims made by KRPg in the correspondence are erroneous. KRPg has incorrectly interpreted the definitions of gross floor area and building from the *Mareeba Shire Planning Scheme 2016* ('the planning scheme') and has identified the incorrect zoning from the planning scheme. Ultimately, these fundamental errors mean that the claims made by KRPg in the correspondence are baseless and false.


Cardno is steadfast in its assertion that the information contained within the development application is factual, accurate and correct. Cardno is a professional consulting organisation with many years of planning experience in this region. Cardno has a commitment to quality as is demonstrated by its certified QMS and integrity is one of Cardno's core values.

Cardno considers the accusations of KRPg to be defamatory and directs KRPg to cease and desist with respect to these claims. In this regard, Cardno demands that KRPg take the following action in relation to this matter:

- a) Remove the correspondence from the KRPB website;
- b) Issue a formal retraction to the correspondence, to be sent to the same recipients as the correspondence, that identifies that the correspondence was erroneous and made false accusations in relation to Cardno's professional conduct in relation to the matter;
- c) Issue a letter to Cardno apologising for KRPB's actions in relation to the matter; and
- d) Publish the formal retraction and letter to Cardno on the KRPB website in place of the correspondence.

Should KRPB not take action within a reasonable timeframe in relation to this matter, legal action may be taken against KRPB without further notice. I trust that this will not be necessary.

Yours sincerely



George Lindsay
Lawyer
Group Legal
Cardno

Enc: Attachment A

Attachment A

Extract from KGPG Website