OSCAR

Recognising and upholding excellence in local government

Mail: PO Box 105
                      Coolum Beach QLD 4573
Mobile: 0417 577 881
Email: president@oscar.org.au

7 September 2018

CEO Sunshine Coast Regional Council

Email: planningscheme@sunshinecoast.qld.gov.au

Subject: Proposed Planning Scheme Amendment – Site Specific and Operational Matters

In making this submission, OSCAR does not intend to comment generally on specific amendments as we believe these are best addressed by our member organisations and individuals directly impacted by the proposed changes.

Rather, our comments relate to high level concerns we have about this round of amendments.

Submission timeframe
The size and complexity of this Amendment Instrument and supporting documents make the 30 day response timeframe inadequate for individuals and volunteer based organisations to make informed responses to all aspects of the proposed amendments.

We note that our request for an extension of the response period was refused by Council. We do not believe the reasons offered to justify this refusal were adequate. We do not believe there was any evidence to suggest there is particular urgency in relation to this matter. The refusal also undermines any claim that the process reflects a genuine attempt at community engagement.

Availability of PS Amendment materials
The fact that hard copies of the amendment documentation were only available in the 3 Council administrative centres, despite our request that this material be also available in the Council's libraries, makes it difficult to interested members of the community to peruse the documents in a conducive environment.

We acknowledge that the material was available on the Council's *Have Your Say* portal but make the point that not all ratepayers have access to the internet and even when they do, the size of the files made them hard for some to download and impractical to print; this was particularly true of some of the maps.

Lack of justification for amendments
With privately owned property, we do not understand why the Council is bypassing the usual process of an application to override the Planning Scheme in each particular instance. This process should be followed as a need would have to be established and the local community could have a say in each particular case.

Council planning staff have conceded that some of the amendments in this Amendment Instrument, as with the previous round of amendments, were initiated by landowners and developers rather than the community. We question the appropriateness of this without additional justification beyond the financial interests of the former.

Example 1

We refer to the proposed changes to zone provisions for land at Pelican Waters Boulevard. There is no attempt to adequately justify why the change (requested by whom?) should be made in the information provided by Council. The statement that *"…the planning scheme provisions applying to Lot 603 on SP221893 be amended to better reflect the intended land use of the site…."* could hardly be deemed to be adequate justification in the light of absence of:

    i.   demonstrated need;

    ii.   the fact that a "food and drink outlet" is totally at odds with the current surrounding character and visual amenity of playground, beach, canal and residences and the relatively heavily landscaped streetscape;

    iii.   increased rubbish; and

    iv.   traffic and parking impacts.

Example 2

In relation to the small-lot residential area at Marakari Crescent, Mount Coolum, the Council has provided no argument that these lots are needed. Agreeing to a landowner's request for rezoning is contrary to Town Planning principles.

This rezoning, if approved, would provide the landowner with the potential for windfall profits without any public benefit being established.

Heights

The blanket approach to increasing building heights is questioned. We acknowledge, and accept, that there is some justification for a rationalisation of height increments but note that this rationalisation of building heights overwhelmingly results in increases – ie the majority of changes result in an increase in height of 1 metre (1,200), with a limited number of sites reducing by 1 metre (150) and also a limited number of sites increasing by 2 metres (150). We believe height increases should only result from a proven need in each instance.

We agree that increments have no relationship to storey height and are confusing; this was a point made to OSCAR at the 3 August briefing we had from Council's planning staff. Nevertheless there is no attempt to "align" height to storeys; it would be useful to facilitate community understanding of the scale of height increments if these were also expressed in terms of the maximum number of storeys that each height increment allows. Doing this may in fact allay concerns people have about these changes.

We also do not understand why the Council has initiated the increase of building heights for State schools facilities rather than the State Government itself which we believe has this capacity?

Absence of yield figures

We believe many of these amendments are driven in part by the desire to accommodate the increasing population predicted for the Sunshine Coast through increases in housing density. This is apparent in the amendments that relate to residential care and retirement facilities which are designed to facilitate integrated vertical retirement and aged care facilities.

Given that a significant component of the Coast's population increase will be an older demographic (aging of the existing population as well as migration to the Sunshine Coast of "southern retirees") we would acknowledge, and possibly accept, an increased densification of retirement/age care developments is necessary.

We note however, that there is no attempt to provide an estimate of the population yield that could result from the amendments (and in fact amendments in previous amendment rounds) contained in this Amendment Instrument and associated documentation. Without this information on yield it is impossible for the community to judge how Council is tracking in terms of realising the population growth projections identified in ShapingSEQ.

Based on statistics previously provided to OSCAR by the Council, we believe that the Council is already well on track to meet population demands based on approved development already underway or in the pipeline. Therefore the community has a legitimate right to see whether any changes to residential density are the result of genuine need or in fact reflect the commercial interests of aged care providers (and developers generally).

Increase in code assessable v impact assessable development

OSCAR remains concerned at the increase in amendments that extend the use of code assessment. We are opposed to any limits on public notification and the rights of community members to make submissions in relation to such development applications.

Accordingly we do not support amendments that increase the use of code assessment – eg the proposed amendment in elation Open Space Zone (Lot 603 SP221893).

Absence of appropriate infrastructure

OSCAR remains concerned that many of these amendments will facilitate subsequent development applications that will be approved by Council without taking into account the lack of appropriate infrastructure (eg public transport, roads, provision of open spaces etc) to support the resulting increases in residential density. The Council has failed at times to require the financial contributions, through infrastructure charges from developers, to sufficiently contribute to necessary infrastructure that is in the remit of the Council. This could be particularly true for integrated vertical retirement and aged-care residential developments.

This problem is compounded by the fact that the Council continues to allow development that impacts negatively on the amenity enjoyed by existing resident on the Sunshine Coast without ensuring that necessary infrastructure, that is the responsibility of the State Government, is in place preceding development instead of trailing it.

Yours sincerely

Greg Smith
President