



Recognising and upholding excellence in local government

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14 January 2019

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**Subject: Proposed Maroochydore City Centre Priority Development Area (PDA) Development Scheme Amendment (No. 2)**

OSCAR would like to make the following submission in relation to this matter.

Council position *	OSCAR response
<p>What is the Maroochydore City Centre PDA?</p> <ul style="list-style-type: none"> <li>• A site declared by State government to facilitate land development in Queensland for economic development.</li> <li>• Was declared to: <ul style="list-style-type: none"> <li>➢ Support economic development</li> <li>➢ Build much needed infrastructure</li> <li>➢ Create new pre-eminent CBD for Sunshine Coast.</li> </ul> </li> <li>• Approximately 62 hectares.</li> <li>• Declared a PDA by Economic Development Queensland (EDQ) in July 2013; Scheme came into effect 11 July 2014.</li> <li>• Minor amendment to Development Scheme April 2016.</li> </ul>	<p>These facts are understood.</p> <p>OSCAR wonders whether the proposed CBD is designed to support economic development or drive the same in the hope of consequent economic growth.</p> <p>We do support the development of a pre-eminent CBD provided this is characterised by:</p> <ul style="list-style-type: none"> <li>• sustainable building and design principles that contribute to a truly smart city</li> <li>• a rejection of the belief that this can only be achieved by excessive height allowances</li> <li>• a “vision” that is matched by a “reality” of adequate infrastructure.</li> </ul>
<p>Development assessment within the Maroochydore City Centre PDA is undertaken by EDQ not Council.</p>	<p>This is noted and understood but we remain convinced that the Council is not particularly effective in challenging the State Government when unrealistic pressure to achieve unsustainable requirements is placed on it – particularly in the absence of appropriate infrastructure which is largely the responsibility of the State.</p> <p>We also note the Council had requested Economic Development Queensland to be the development assessment manager for the new CBD and requested they do so to "ensure transparency in the development assessment process" considering Council was the owner and SunCentral the master developer of “most land in the PDA”. This is right</p>

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	<p>and proper under the circumstances but suggests that the Council/SunCentral has much more control over development related matters in the CBD than it implies.</p> <p>OSCAR remains concerned about the potential precedent of development scheme amendments in the CBD to “leak” into other areas of the LGA.</p> <p>Although Council argues that this is not a normal planning amendment, as the CBD is a PDA and the Council is only acting as an “agent” for the State government, and it has no capacity for precedent we doubt the development industry will perceive it that way!</p>
<p>So why amend the Development Scheme?</p> <ul style="list-style-type: none"> <li>• 11 August 2017, State government released SEQ Regional Plan 2017.</li> <li>• Sets policy direction to 2041: <ul style="list-style-type: none"> <li>➢ Sets dwelling targets</li> <li>➢ Guidance to distribution of growth</li> </ul> </li> <li>• Council’s response: <ul style="list-style-type: none"> <li>➢ Increase residential yields in the PDA</li> <li>➢ Undertake a general review</li> </ul> </li> <li>• Amendments will : <ul style="list-style-type: none"> <li>➢ Advance SEQ growth management objectives and infill targets</li> <li>➢ Support primacy of Maroochydore PRAC</li> <li>➢ Ensures SCC’s vision for the CBD is implemented.</li> </ul> </li> </ul>	<p>OSCAR believes that some of the SEQ Regional Plan population growth projections remain untested and may be exaggerated.</p> <p>Nevertheless, we accept that significant growth is inevitable and the Council and the community must demand the infrastructure (significantly the responsibility of the State) that is required to support this population growth is delivered <b>before</b> approving developments that exacerbate the problems already being experienced on the Sunshine Coast rather than <b>after</b> the event – the CBD should not be exception to this.</p>
<p>What does proposed amendment (no.2) involve?</p> <ul style="list-style-type: none"> <li>• Increase residential yield targets from 2000 dwellings to 4000 dwellings. Amend maximum building height provisions and maps.</li> <li>• Amend on-site car parking rates.</li> <li>• Update to ensure consistency with Infrastructure Agreements 2017.</li> <li>• Update and review of Implementation Strategy.</li> <li>• Update Development Scheme using EDQ latest template (format changes).</li> <li>• Consequential amendment to give effect to above to improve clarity and efficiency of Development Scheme.</li> </ul>	<p>These issues are addressed below.</p>

Council position *	OSCAR response
<p><b>Why increase residential density?</b></p> <p>Increasing maximum residential yield will:</p> <ul style="list-style-type: none"> <li>• Assist Council in meeting urban consolidation targets set in SEQRP.</li> <li>• Ensure Urban Footprint regional land use category effectively utilised.</li> <li>• Support primacy of Maroochydore PRAC.</li> <li>• Support expectation for higher density residential to assist with housing needs close to employment and planned high frequency public transport.</li> </ul>	<p>We agree, in general terms, with the changes that contribute to the CBD taking a fairer share of population growth projected for the Sunshine Coast – we believe a modest increase in residential density in consolidation/infill areas might be appropriate (particularly in this case which is essentially a brownfield site) and is preferable to excessive development in expansion/greenfield areas that contribute to urban sprawl.</p> <p>The projected increases should negate, in part, the perceived “need” for additional high/higher density development in localities such as TWW, Yaroomba and Yandina for example.</p> <p>We also acknowledge the desirability of providing housing that is close to employment and high frequency public transport provided these are delivered in a timely fashion but we remain concerned about the lack of infrastructure to support the potential size of the CBD.</p> <p>We also wonder where is the missing information that explains how traffic issues, proximity to all forms of transport, access to educational, aged care and health facilities etc for the extra 2000 dwellings will be adequately dealt with.</p>
<p><b>Why amend building height?</b></p> <ul style="list-style-type: none"> <li>• To facilitate proposed additional residential yield in the PDA <ul style="list-style-type: none"> <li>➢ Increase building heights</li> <li>➢ Increase plot ratio.</li> </ul> </li> <li>• Will promote best practice sustainable commercial and sub-tropical design: <ul style="list-style-type: none"> <li>➢ Greater floor to floor heights</li> <li>➢ Reduced need for artificial lighting</li> <li>➢ Reduce need for ventilation</li> <li>➢ Reduce need for partitions, service columns.</li> </ul> </li> <li>• Amend building height definition to exclude roof top plant, antennae etc and permit roof top bars and restaurants.</li> </ul>	<p>We question why buildings need to be so high and why plot ratios are to be increased?</p> <p>Notwithstanding the flexibility argument and that the permissible maximum height levels may not be taken up, we wonder what limitations/performance outcomes will be applied?</p> <p>We are concerned about the visual amenity impact with the dominance of the built environment, particularly against the backdrop of Cotton Tree and the Maroochy River. We also share the concern of existing residents adjacent to the CBD that the proximity, height and bulk of potential buildings will result in loss of privacy and visual amenity, create overshadowing and compound the existing problems of traffic congestion in the areas around the CBD.</p> <p>We are pleased that the Council has identified best practice sustainable commercial design attributes</p>

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	<p>but remain unconvinced that it has the capacity to deliver on this promise.</p> <p>We oppose amendment of the building height definition to exclude roof top plant, roof top bars and restaurants etc. While we acknowledge that it is important for the CBD to be a vibrant environment that does not “close down” after 6:00 pm we think the Special Entertainment Precinct proposed for the CBD mitigates the need for height definitions to exclusion roof-top infrastructure outside the SEP.</p>
<p><b>Why amend car parking?</b></p> <p>Replaces non-residential car parking rate for land uses from a flat rate to a cascading rate. Why?</p> <ul style="list-style-type: none"> <li>• Maroochydore City is designed using principles of transit oriented development. <ul style="list-style-type: none"> <li>➢ Reduced on-site car parking rates in anticipation of long term shift away from car travel and delivery of high frequency mass transit</li> </ul> </li> <li>• PDA Car Parking Strategy premised on reduced on-site parking supply supplemented by consolidated public parking (multi-decks).</li> <li>• Provides flexibility and commercial attractiveness in early stages of development until 1<sup>st</sup> multi-deck public parking facility delivered.</li> </ul>	<p>OSCAR is particularly concerned about proposed parking provisions in the CBD. We believe that the proposed residential parking rates are manifestly inadequate at 1 lot per dwelling. If the residential precincts of the CBD are to consist of quality developments, the majority of dwellings will almost certainly be 2 bedrooms or more. This will generate a level of demand from potential purchasers for more than one parking space and for that space to be in the same building as their dwelling.</p> <p>The Council is justifying the reduction in on-site car parking lots on the “anticipation” of a long term shift in the way people travel. While OSCAR acknowledge, and strongly supports, the “vision” and intent of the SCRC’s Integrated Transport Strategy, this is an aspirational document that is dependent on factors that are largely outside the control or responsibility of the Council (eg the reliability and frequency of public transport generally) or beyond the resources of Council (eg light rail specifically).</p> <p>The notion that the CBD parking strategy is based on the assumption that as “needs arise we can throw up another multi-deck” as a Council officer put to me in a recent conversation, creates considerable concern in our mind!</p>
<p><b>Why amend the Implementation Strategy?</b></p> <ul style="list-style-type: none"> <li>• To be consistent with the latest EDQ format and drafting style and to reflect Council’s smart city platform.</li> <li>• Key focus areas for Implementation Strategy refined and updated: <ul style="list-style-type: none"> <li>➢ Delivery an exemplar regional CBD</li> <li>➢ Delivery a high-quality public realm</li> </ul> </li> </ul>	<p>As previously stated we share the Council’s desire to have a smart city but believe “smart” is defined by technical innovation (eg waste removal systems, smart parking solutions), provision of first class pathways, parks and playground facilities, innovative and sustainable design principles in the built form etc.</p>

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<ul style="list-style-type: none"> <li>➤ Applying innovation and smart city technology</li> <li>➤ Delivering key public transport corridors.</li> </ul>	<p>What we see however is a CBD defined, for example, by:</p> <ul style="list-style-type: none"> <li>• high buildings more akin to what is seen in Brisbane or the Gold Coast and totally out of keeping with our locality; we are particularly concerned by the flagging of an “iconic building”, where maximum height has not been determined; this supports our suspicion that “iconic” seems to equate with height rather than with innovative design in Council’s mind</li> <li>• a deficit of open, green space where there is no additional compensatory public/green space for the additional density/increase in resident and visitor population.</li> </ul>
<p>Why update the Development Scheme to ensure consistency with Infrastructure Agreements?</p> <ul style="list-style-type: none"> <li>• Infrastructure agreements are now in effect.</li> <li>• Development Scheme needs to properly reflect these agreements.</li> <li>• Network Maps updated to reflect Infrastructure Agreements</li> </ul>	<p>We accept this rationale but question whether the Infrastructure Agreements that are in place are adequate for the outcome desired of the CBD.</p>

(\* Based on a Council briefing provided to OSCAR on 10 December 2018)

**Summary**

OSCAR would like to highlight our concern about the lack of community engagement in this process. We acknowledge that the Council provided us with a briefing (which was both appreciated and useful) and conducted a community information session which was well conducted and provided plenty of information to those in attendance. This does not, however, constitute adequate community consultation/engagement. The Council’s response so far to our requests for greater involvement in the “city hall” planning, while not directly relevant to this development scheme amendment, is evidence of its reluctance to undertake genuine consultation. Council appears to prefer a presentation of what has already been decided on behalf of the community rather than a genuine dialogue with ratepayers.

While OSCAR supports the concept of a smart and innovative CDB for our region we remain concerned that these amendments will facilitate subsequent development that is more about bulk and height than it is about adherence to good design principles and achievement of high levels of amenity for its prospective inhabitants and visitors.

Yours sincerely



Greg Smith  
**President**