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## Organisation of Sunshine Coast Association of Residents Inc (OSCAR) Sunshine Coast Mass Transit Submission

### INTRODUCTION

The Organisation of Sunshine Coast Association of Residents Inc (OSCAR) is a non-partisan and not-for-profit umbrella/peak organisation representing community organisations and individual residents on the Sunshine Coast Regional Council and Noosa Shire Council Local Government Areas (LGAs) in South East Queensland.

OSCAR does not support the SCRC's five preferred transit options but does support an option that provides region-wide bus service enhancements operating on new and existing routes with greater frequency, more direct routes and better connections but also incorporating the provision of new technology including a more modern and agile bus fleet and also incorporating the future development of transport along the CAMCOS route which does not indicate heavy rail as the only option on this corridor.

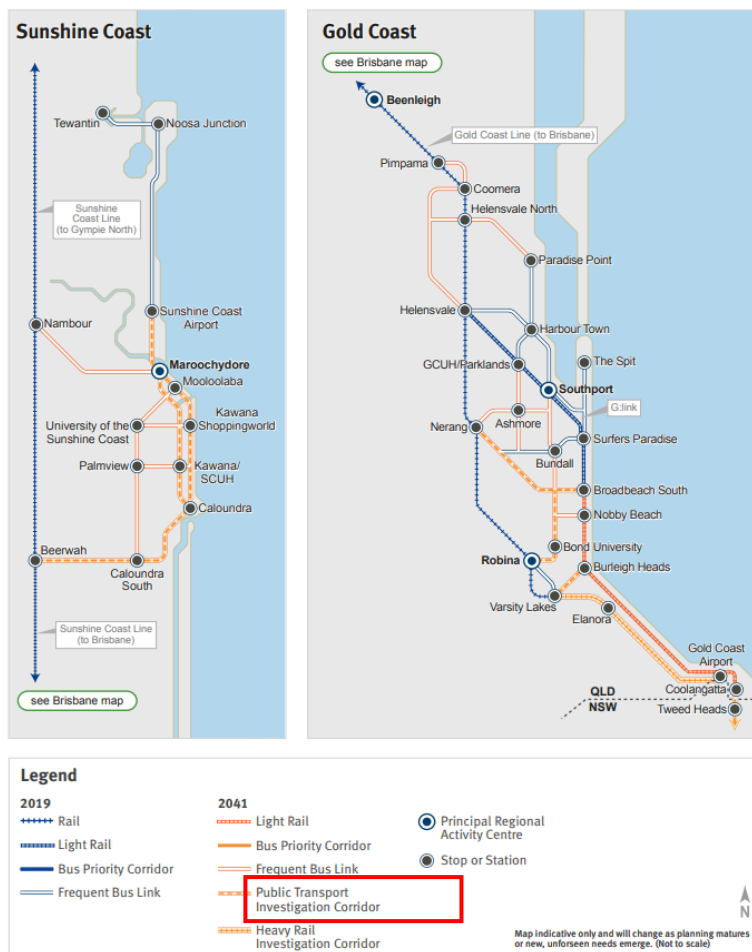


Figure 13: Sunshine Coast Indicative Frequent Public Transport Network 2041

Figure 14: Gold Coast Indicative Frequent Public Transport Network 2041

Source: SEQ Regional Transport Plans - 2021, p55 (DTMR)

In OSCAR's view, this represents an immediate and affordable solution for staged improvements to public transport in the region with an investigation of CAMCOS as a **future stage** also supported.

OSCAR further believes that population increases appropriate for various coast communities should be driven by the planning scheme which in turn guides appropriate transport strategies and not the other way around.

We believe the Council should, in conjunction with State Government, review the Draft Options Analysis Report (OAR) before it progresses to the State Government to incorporate:

- more rigorous testing of the assumptions in the draft report and a review of the appropriateness of weightings given to increased densities in the coastal corridor in assessing the comparative performance of options
- consideration of impacts of a mass transit solution in the Urban Corridor including:
  - the current Planning Scheme and implications for PS 2024
  - availability of Federal and State funding and the likely extent and quantum of any Council contribution (ie ratepayer contribution)
  - implications of the full range of environmental impacts along the coastal corridor
  - implications of TMR's plans for the region – eg the Mooloolah River interchange, additional Kawana Way lanes, and planned additional road south from Maroochydore
  - developments in transport infrastructure and technology including the provision of "on-demand" public transport and rental e-bikes etc
  - Olympics 2032 technology and infrastructure requirements on the Sunshine Coast
  - connectivity with the regional transport system and role in the regional transport strategy (road, rail, other public and active transport elements)

### **Comments about the community consultation**

OSCAR would like to acknowledge the positive aspects of the Council's consultation associated with the Mass Transit Project (MTP), in particular, the 2-month response timeframe, the extensive documentation provided on the Council website the frequent pop-ups sessions that were conducted by Council staff throughout the region.

We do however have concerns about the limitations of the "official" online survey instrument including the fact that it contained some closed questions and more tellingly that there was no mention of the cost of each of the preferred options anywhere in the survey. A proper understanding of the costs associated with each of the preferred options should have been presented to people who completed the survey, within the survey's supporting text.

Council's introduction on its Have your say website page states:

*"Over an eight week period from 28 April until 22 June 2021, you have a chance to have your say on the best public transport options for our region, not only for today but well into the future as our region continues to grow. You will also have the opportunity to have your say on placemaking opportunities and ways to accommodate growth in the Sunshine Coast Urban Corridor."*

We were therefore concerned that the pop-up sessions appeared to be predominately designed to promote the Council's preferred options rather than gathering the views of attendees. The use of 3D visualisations was interesting but did nothing other than show stations, with fences along the edge of the road and single storey residences beyond the fence!

A more realistic example would have included a representative view of one of the "transport hubs" with the mode of transport and the accompanying residential development (medium to high-rise).

The pop-ups were predominately held during workdays and north of the Maroochy River there were no weekend or after hours pop-ups held despite requests from OSCAR and others. This certainly limited attendance by the working population.

We would like to reiterate our belief that all unique (ie non-duplicate) submissions be taken into account no matter how submitted and in what form (something Council staff have repeatedly assured us would be the case) and that the Council provides, at the very least, information about the number of submissions received and a summary of what they contained.

**Note: OSCAR has used the questions from the online survey as the basis for our submission to assist Council in recording our contribution in the overall survey responses.**

**1 Please provide us with your email address so we can keep you updated:**

[mail@oscar.org.au](mailto:mail@oscar.org.au)

Contact: Melva Hobson, OSCAR President, 0433 214 320

**2 Which suburb do you normally live in?**

As OSCAR is a peak organisation our membership covers the whole of the Sunshine Coast Local Government Area as well as that of the Noosa Shire.

**3 Thinking about the type of mass transit system you would like to use, what features do you think are important? You can nominate as many as you like and add others.**

We believe:

- all of the characteristics listed in the survey are desirable but they are not limited to the Council's preferred options and would apply to our preferred option as well
- a mass transit system should be about the provision of public transport across the whole region and not based on urban transformation considerations (particularly where higher densification, whatever its form, is intended to occur initially in one location only)
- any mass transit system that is adopted must be cost-effective and impose a minimal cost on the ratepayers of the Sunshine Coast given that the provision of public transport is predominately the responsibility of the State Government.

**4 How important do you think it is to have a good mass transit system on the Sunshine Coast?**

It is very important to have a good mass transit system on the Sunshine Coast.

Unfortunately, the Council has used this terminology far too narrowly; it has decided that Mass Transit applies only to the Urban Corridor and that only particular modes of transport are desirable within that corridor.

**5 How satisfied are you that the Integrated Public Transport Master Plan provides a suitable basis for serving the long-term public transport needs of the Sunshine Coast**

OSCAR agrees that any Integrated Public Transport Master Plan needs to be delivered in stages; the Council does not have either the responsibility or financial resources to fund any of the proposed stages as only the State and Federal Governments have the capacity to do so and even they would only resource all the proposed stages of such a plan over a long period.

However, OSCAR believes the Council's proposed staging is not the appropriate one and would suggest a staging model that has the following priority and stages:

- The provision of region-wide bus service enhancements operating on new and existing routes with greater frequency, more direct routes and better connections but also incorporating the provision of new infrastructure including a more modern and agile bus fleet using renewable energy sources - eg electric, hydrogen and solar-powered buses.

This would be achieved in conjunction with a strong commitment to providing the highest level of access for people with disabilities and/or mobility limitations and an ongoing

program of improvements to the pathway network to facilitate walking, bicycle and other micro-mobility access to the system.

- The provision of regional rail or busway from Beerwah to the Maroochydore City Centre in the CAMCOS corridor.
- Continuing upgrades to the Beerwah to Nambour rail line.

Accordingly, we do not support the development of a local mass transit system in the Sunshine Coast Urban Corridor or any of the 5 preferred options being recommended and believe the Council needs to do more work on the OAR before it is presented to Councillors for adoption and before being forwarded to the State Government.

The reasons for our position are addressed in the following sections of this submission.

### More rigorous testing of the assumptions in the draft report is required

There are several deficiencies with the OAR that result in more favourable ratings for the preferred options. We identify three examples below but there are other instances where unsubstantiated claims and figures are used.

This requires more rigorous analysis if the OAR is to be taken seriously by the State.

#### Example 1

The *Qualitative MCA comparison of options against certain attributes of quality public transport* in the OAR (Table 1, p 25) seems to rate certain attributes unusually poorly yet the “preferred” option of light rail scores perfect 10s on all attributes!

Table 1 – Qualitative MCA comparison of options against certain attributes of quality public transport

Attribute	Region-wide bus upgrade Category C	Region-wide bus upgrade + infrastructure Category C	Road network upgrade Category C	Quality Bus Corridor (QBC) Category C	Bus Rapid Transit (BRT) Category B	LRT Category B	wLRT Category B	Trackless tram (TT) Category B
Legibility of the system to users	3	4	3	7	10	10	10	10
Reliability of service and the total travel time	3	4	3	7	9	10	10	9
Ride quality	3	3	3	3	8	10	10	9
Minimising travel time with reliable, running times	3	4	3	6	9	10	10	9
Minimising lost time (layover) between services	3	3	2	9	7	10	7	7
Ensuring the vehicles have sufficient peak passenger capacity	5	5	4	6	7	10	10	8

OSCAR would be very keen to know how these ratings were arrived at. We can see no justification for the low ratings of the Region-wide bus upgrade + infrastructure option (the option closest to OSCAR’s preference) for any of the attributes but particularly the “3” rating for Ride quality (unless the baseline is a poorly driven, large diesel bus perhaps with its airconditioning out of service!).

#### Example 2

The *Multi Criteria Assessment* in the OAR (Table 45, p 170) applies an assessment weighting to each of the criteria that, in OSCAR’s view undervalues the weighting for Cost and Risk and to a

lesser extent for Sustainability and liveability criteria. Further, we believe that the Land use outcomes criterion is deliberately weighted too highly to produce the outcome always desired by the Council – ie light rail.

OSCAR is also surprised that Table 45 attributes only a 45% loading to the Transport outcomes, given that the fundamental reason an MT project is being pursued at all is to achieve the best outcome for public transport.

Table 45 – MCA criteria

Criteria	Description	Core Assessment Weighting
<b>Transport outcomes</b>	Impacts of the option on mode share, travel times, congestion, PT reliability, future transport network development. Focused on PT impacts.	45%
<b>Land use outcomes</b>	How the option impacts on the land use outcomes in the corridor and enables urban change and promotes urban consolidation. This criterion considered the amount of development likely to be generated by each respective mode and its ability to satisfy the urban consolidation criteria of <i>ShapingSEQ</i> and Council.	30%
<b>Cost and risk</b>	Comparative whole of life costs including capital and operating cost estimates over 30 years for each of the scoped options, discounted at 7 per cent real (economic discount rate).	15%
<b>Sustainability and liveability</b>	This criterion aims to achieve a positive impact of the option with respect to air pollution, noise pollution, water pollution, greenhouse gas emissions, impact on nature and landscape, urban separation and urban amenity.	10%

### Example 3

The *Results of economic appraisal* in the OAR (Table 84, p 274) also causes us considerable concern.

Table 84 – Results of economic appraisal (\$ million, 2019/20 real, discounted at 7 per cent over a 30-year appraisal period)

Cost Item	LRT		wLRT		BRT		TT		QBC
	Without land use response	With land use response	Without land use response	With land use response	Without land use response	With land use response	Without land use response	With land use response	Without land use response
<b>Costs</b>									
Capital expenditure (P50)	1,087	1,087	1,073	1,073	936	936	942	942	299
Operating expenditure	234	234	234	234	222	222	222	222	-
Capital replacement	12	12	12	12	12	12	12	12	-
<b>Bus operator costs</b>	<b>223</b>	<b>223</b>	<b>256</b>	<b>256</b>	<b>223</b>	<b>223</b>	<b>256</b>	<b>256</b>	<b>206</b>
<b>Total economic costs</b>	<b>1,557</b>	<b>1,557</b>	<b>1,542</b>	<b>1,542</b>	<b>1,393</b>	<b>1,393</b>	<b>1,432</b>	<b>1,432</b>	<b>504</b>



We remain baffled why there is no column for QBC - With land use response. We have been advised by James Coutts that this is because:

*“The draft Options Analysis report observes in a number of places (such as Chapter 8) that a QBC is judged as being unable to influence land use outcomes because such treatments as painted lanes and bus stop upgrades lack the permanence of a dedicated mass transit corridor carrying LRT, TT or BRT vehicles, which have far more presence and prominence. From discussions with PwC, I know that they were unable to cite an example of a QBC system anywhere in Australia that had demonstrably produced a land use response, even though they were of the view that a well-executed QBC would*



*seem to have at least some capacity to do so. It comes down to the requirement for a business case to be based on facts and proven performance, not supposition or wishful thinking. Nonetheless, this topic could probably be more fully addressed in the final Options Analysis report.”*

While we accept this explanation and look forward to seeing how it is addressed in the final OAR we do not believe you cannot attribute any economic benefit to being on a bus-based form of public transport irrespective of whether it operates in a dedicated lane or not. Common sense suggests that proximity to public transport does impact land values and while it is probably true the quantum will be lower than modes of public transport involving fixed infrastructure would rate higher, it is misleading to effectively attribute zero economic benefits to a land-use attribute for a good bus-based system.

We also asked why the cost item Car user travel time savings (existing users) shows negative values:

Car user travel time savings (existing users)	(95)	(42)	(95)	(42)	(95)	(91)	(95)	(91)	(76)
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The response to this question was:

*“These negative values are largely the result of the transport model having to assume a base case that does not include a number of key investments in the road network (such as for the MRI & Kawana Arterial), meaning that each of the recommended options would take up some currently highly contested road space, which would result in there being less space for cars and more (rather than less) cost in the form of delays. This would change if the MRI was to be factored into the network. We might look to re-run these numbers now that the MRI appears to be a more certain prospect.”*

This seems a reasonable answer but reinforces the need to rework the economic appraisal and instigate some form of community engagement on the results of a “look to re-run these numbers now that the MRI appears to be a more certain prospect”. We agree that certain events have occurred since the release of the draft OAR (eg the MRI funding commitment) but these need to be analysed before the OAR goes to the State.

Another anomaly appears to be when “rating” the Health benefits from active travel as part of a PT journey. Table 84 shows a negative figure for this cost item:

Health benefits from active travel as part of a PT journey	46	51	46	51	46	46	46	46	(26)
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Again, James Coutts explained this as follows:

*“This is because the economic analysis is based on the assumption that the QBC option would operate with more buses and bus stops compared to base case and would therefore reduce the number and length of related walking trips. The other recommended options have services and stops spaced further apart compared to the base case, which on average involves slightly longer walking trips, hence greater health benefits.”*

This response suggests that these ratings derive from a comparison with each other when surely this cost item should be assessed against the alternative of travelling in a vehicle. While we acknowledge that a bus-based mode may require less walking because of shorter distances to stops, it is quite disingenuous to suggest that there will be a negative impact on health compared to completing a trip by private vehicle instead!

### **The current Planning Scheme and implications for PS 2024**

“The draft Options Analysis report observes in several places (such as Chapter 8) that a QBC is judged as being unable to influence land-use outcomes (our emphasis).... As per James Coutts response page 6 of this submission).

OSCAR maintains that the Planning Scheme 2024 process should occur before the MT options are determined and should not be beholden to land use outcomes proposed in the MT preferred options proposal. As the community responds to the new proposed PS provisions across the region, which may include the densities and heights to which the MT project refers, it is after that time that the Transport Options should be considered.

It is during the PS development process that the issues relating to population growth, population numbers, and SEQRP land monitoring reports raised in the section Urban Transformation and Population Growth ( p.12 of this submission) must be addressed clearly and transparently.

The section of the Council survey relating to Urban Form (p10-11) refers to a range of building heights from 1-8 storeys depending on the selected scenario 1-3. Several OSCAR members participating in roundtables heard representatives from the development industry indicate that they need 10 storey buildings, not 8! Our members are very concerned that heights will be proposed under PS 2024, and then challenged by some in the development industry in seeking relaxations. These issues need to be resolved in the PS development before the final determination of MT Options.

Perhaps of greater concern will be that should the MT Options be determined before the Statutory Processes of PS 2024 that there will be applications submitted seeking amendments to the provisions of the current PS. Such moves would be counter-productive to the Design, Placemaking Principles, CHAS and Heritage provisions yet to be incorporated into the PS 2024, and as such have no statutory basis under the current PS. This may create complex and potentially costly legal situations for Council in refusing applications that may reference the “possibility of or suggested need”, for example, of greater height and density provisions as yet not endorsed by the community under statutory processes.

As there is currently no designated or agreed funding for the MT proposals by any level of government it would seem premature to either propose amendments to the current PS or build in significant height and/or density provisions to any future PS, until “in principle” agreements have been reached with the State and Commonwealth Governments re Regional Transport priorities for the Sunshine Coast LGA. Not doing so could potentially exacerbate the congestion issues argued by the Council.

Similar concerns as discussed in the next pages of this submission (pages 9-12,) relating to environmental, social, and cultural implications are very real in pre-empting the current and future Planning Schemes. These issues must be subject to a rigorous, independent and detailed impact assessment as suggested on the following pages to inform future PS development and potential current PS amendments.



## **Cost - availability of Federal and State funding and the extent of any Council contribution**

Given there is NO commitment by either the Commonwealth or State Government to any of the Integrated Public Transport Master Plan components, and the reality that other levels of government are unlikely to fund, all or even any of the Master Plan, it would require a Council contribution which would place a financial burden on all ratepayers including those that would derive no benefit from the proposals.

## **The environmental impacts along the coastal corridor**

Section 19.1.5 of the OAR asserts that, when completed, it is expected the MTP will improve the local environment and amenity through an improved transport system and reduction in traffic growth in the MTP catchment. Improved local air quality and reduced local greenhouse gas emissions will likely also result from this.

It seems premature to make these assertions. Elsewhere in this submission, OSCAR challenges whether the preferred Mass Transit options do achieve the objectives of the MTP locally and regionally, such as appreciably higher public transport usage, reduced traffic growth, reduced congestion, improved emissions and liveability etc.

Section 19 states that the preliminary social and environmental impacts conducted as desktop assessments did not identify any impacts that would prevent any of the MTP options from proceeding. Impacts and benefits are to be more extensively assessed and evaluated at the Detailed Business Case stage. The preliminary assessment did identify a wide range of negative impacts that need to be managed in later stages of the MTP, including construction and operational effects, and identified further investigations and/or monitoring to refine the understanding of potential environmental and heritage impacts as design proceeds.

Preliminary desktop social and environmental assessments are notorious for inadequate scope and depth of assessments, especially where the project proponent is also the assessor. The detailed work to assess the impacts of the MTP is, therefore “kicked down the road” to later stages.

However, there are several major matters concerning the MTP which need to be considered in more detail at this stage, including :

- the full suite of Climate Change impacts on the chosen route and the comparative impacts on the initial 9 options investigated
- fauna, flora, aquatic environment, wetland, water quality and acid sulphate soil impacts in the Mooloolah River crossing/ interchange and Bundilla areas where Mass Transit and park and ride infrastructure is planned
- fauna, flora impacts on vegetated dunes, adjacent beaches and the Alex Forest reserve at Cotton Tree and Alexandra Headland
- coastal management and hazard issues in the Cotton Tree to Mooloolaba beach areas and the lower Mooloolah River estuary ( including relevant outcomes of the CHAS project and the comparative impacts of the 9 initial options)
- baseline noise and comparative noise impacts of the options investigated along the route
- potential acid sulphate, riparian vegetation and fauna and flora issues at the Birtinya station area

- further work on the likely extent of compulsory acquisitions and the social, economic and amenity consequences, which will differ between options
- further work on vehicle, pedestrian and cyclist access and vehicle parking in the Cotton Tree to Mooloolaba section of the route, including the proposed bikeway issues.

### **Assessing the MTP and densification impacts comprehensively and concurrently**

The recurrent problem with the OAR is that consideration of the social, cultural, environmental and economic impacts of the increased density land use associated with the MTP are intended to be addressed later in the 2024 planning scheme process, not as part of the MTP options analysis and business case process.

Planning scheme processes, including the public consultation, are not an effective vehicle for identifying, assessing and resolving impacts, nor for in-depth consideration of alternative land use scenarios and comparative consequences. The public is presented with massive amounts of material to consider all at once in scheme public consultation processes, and the studies and information underpinning the proposed land uses are normally not disclosed at all or not in a way that assists the public to assess the merit or otherwise of the land-use proposals.

OSCAR suggests that the planning scheme consultation process cannot equate to nor do the job of a comprehensive and rigorous social, cultural and environmental impact assessment process.

OSCAR suggests that the totality of the impacts arising from the MTP and the associated densification must be addressed at the same time. The following examples demonstrate the need for this comprehensive, combined, concurrent assessment approach:

- i. A hydrology, flooding or water quality study on the MTP elements will be different from a study considering the project plus the impacts arising from the urban densification (such as the combined implications for the Mooloolah River estuary or on the transport route).
- ii. An air quality study on the MTP may have to be expanded to include air quality-related health impacts if the densification results in the accumulation of small particle carbon pollution from diesel use in a transport corridor with near-continuous medium and high-density buildings on either side creating a transport air canyon effect.
- iii. Impacts on the marine environment, such as endangered turtle nesting on local beaches would most likely not be addressed for the MTP, but they are very relevant for densification because of light shedding on the beaches and urban light glow effects.
- iv. Environmental health assessments for the MTP would not address the potential heat island impacts of the densification.
- v. The MTP would probably not assess the full range of coastal process issues such as sea-level rise, storm surge, erosion, dune vegetation, sand replenishment etc, but the need to protect fixed mass transit infrastructure and the nearby valuable densification development arising from the MTP could well produce proposals for hard engineering protective action such as rock-walling nearby beaches and have impacts on dune vegetation, beach access, visual amenity, and in turn also raise different coastal management issues.
- vi. The social impacts associated with any compulsory property acquisitions for the MTP will be very different from acquisitions required for the urban densification (such as for public

open space, bike and pedestrian pathways, or social infrastructure buildings), while the combined acquisitions magnify the scale and significance of these issues.

- vii. The range and significance of Climate Change impacts associated with densification are very different from those for the MTP itself.

The rationale for considering the combined MTP and densification impacts concurrently has been raised as a fundamentally important issue by the community. It is both a process problem and a methodological integrity and validity problem.

OSCAR recommends that Council explore how it can work with the community to find a way to address these legitimate community concerns.

### **Failure to integrate the assessment of the social and environmental impact with other sections of the study**

OSCAR is also seriously concerned that the relevant elements of the combined social, cultural and environmental impacts of the MTP and the land use densification have not been included in the Risk Assessment in Section 14 of the OAR nor the Economic, Financial and overall Cost/Benefit analysis sections of the draft study.

We understand that this will require a great deal of additional work, but this must occur to ensure that there is a comprehensive, objective basis for comparing all of the initial 9 options. For example, the following are required:

- i. An assessment of the full suite of climate change impacts and risks could highlight the disadvantages of any form of fixed track and wired infrastructure Mass Transit and recognise the advantages of the bus options because of their flexibility in avoiding or minimising impacts.
- ii. Compulsory land resumption levels, costs and risk factors would vary greatly across the options.
- iii. Noise mitigation requirements and costs would also vary greatly across options.
- iv. Expensive and disruptive engineering works like rock-walling beach areas might be necessary for some options but not a relevant consideration for others.

This body of additional work should be undertaken in revising the draft OAR and before proceeding with a final business case.

### **Addressing Qualitative and Intangible Cultural Impacts**

Many of the community concerns are about perceived threats to the Coast's iconic beaches, access to those beaches, beach culture and lifestyle, and the availability and amenity of existing beachside housing and beachside suburbs.

We appreciate that cultural and lifestyle matters are difficult to assess even in qualitative ways. However, Council must attempt to do so. The outcome of the public consultation process through the assessment of survey responses, petitions and submissions will be a guide to what those cultural impacts are and their significance.

## The urban transformation and population growth myth

OSCAR considers that the problem (**Problem 1** - *An accelerating trend towards the expansion of the urban area of the Sunshine Coast*) identified is not clearly defined by Council and it is, therefore, difficult to gauge whether or not Mass Transit is a relevant consideration.

We assume the Council is implying that there will be a need for additional Expansion areas to be identified because dwelling yield in the Expansion and Consolidation areas are not achieved and/or supply is exhausted and that Mass Transit and any associated change in dwelling density and yield has a material effect on these matters at a regional level.

OSCAR considers that at this point the Sunshine Coast region is on track to satisfy the population growth and land and dwelling supply expectations of ShapingSEQ 2017 and that there is currently no basis for Council to imply a risk that new expansion development areas will be required. There is also no basis for using such an implied but unsubstantiated urban expansion risk to encourage communities in the region to support a Mass Transit system and the related increased densities in the coastal corridor, nor to imply that any such intervention will single-handedly have a material effect on avoiding new urban expansion in the future.

In coming to these conclusions we have considered the 2020 Land Supply and Development Monitoring Report (DSDILGP) and Council's Mass Transit Fact Sheet 14 concerning population growth and dwelling supply.

The Report indicates that the capacity and realistic planned dwelling capacity of the Consolidation and Expansion areas provide the minimum 15 years supply required by ShapingSEQ. The capacity in the Expansion area is 7200 dwellings greater than the 33300 requirement to 2041 and the realistic supply is about equal to the latter and represents 18 years supply. In the Consolidation areas there is the required 15 years minimum of supply, but a 12300 dwelling shortfall in the 2041 dwelling supply benchmark of 53700. There are 20 years and at least two new planning schemes to decide how to plan and deliver the latter shortfall in Consolidation dwellings – and therefore no need for a premature over-reaction to the shortfall in the new 2024 planning scheme.

Furthermore, Fact Sheet 14 indicates that Beerwah East is slated to deliver 4000 dwellings by 2041, but Council estimates capacity there at about 20000 dwellings, while a report prepared for Stockland estimated capacity at 26000 dwellings. Either way, there is considerable residual dwelling capacity beyond 2041 and also considerable scope for structure planning to deliver overall higher yield via some higher density development at Beerwah East.

Fact Sheet 14 also indicates that a very high proportion (27%) of the required new regional dwellings to 2041 are slated for the full coastal urban corridor from Maroochydore to Caloundra. The existing planning scheme has already provided about 80% of the 25500 dwellings required in the corridor by 2041. This leaves just a further 5000 dwellings to be planned and built over the next 20 years and through at least two new planning scheme processes to satisfy Shaping SEQ requirements.

### How would another 25,500 dwellings fit into the Sunshine Coast Urban Corridor?

The provisions of the existing Sunshine Coast planning scheme allows for a large proportion of the projected 25,500 dwellings to be accommodated. About 14,500 dwellings are able to be accommodated in the existing centres of Maroochydore, Mooloolaba, Kawana and Caloundra. Since 2016, about 6000 dwellings have already been built in the Sunshine Coast Urban corridor.

This leaves around an additional 5000 dwellings that need to be built in the corridor by 2041 that are not yet provided for in current planning provisions. How these dwellings are best accommodated in the Sunshine Coast Urban Corridor will be part of this community engagement.

Source: Mass Transit Fact sheet 14

We appreciate that 6000 dwellings have been built since 2016, which means the planning scheme dwelling capacity in the corridor is being taken up at a rapid rate. However, this does not mean there is an urgent need to identify additional dwelling capacity in the new 2024 scheme in the coastal corridor nor any basis for seeking to satisfy a proportion of the Consolidation area dwelling shortfall referenced in the above Report through additional medium and higher densification of the coastal corridor.

A full range of land use planning options for satisfying all or some of the latter regional Consolidation dwelling shortfall can, and should be, explored through the 2024 scheme development process, but we are concerned that any decision by Council to pursue the Mass Transit business case runs the risk of prejudicing sound and unbiased consideration of the available options across the region.

### **The coastal v hinterland divide**

We believe the hinterland community feels it is critical to the case the Council has been trying to make, even though it falls outside the scope of this consultation (an issue in itself), that concentration of population growth in the coastal corridor will mean that high-value areas elsewhere on the Sunshine Coast will be saved from development.

This point has been repeatedly made by Council staff (at the SCEC Roundtable Meeting a few weeks ago) when making the case for the current proposal but when asked whether that offset would be “set in stone” it was admitted that if the proposed mass transport went ahead in the Urban Corridor there would be no change in the Council’s assessment of development applications, which would continue to be based on whatever the Planning Scheme was at the time.

Of course, even if that trade-off were guaranteed, it is not correct to believe that hinterland communities would support the current mass transit proposal. People living in the hinterland treasure and use the coastal areas as much as anyone on the Sunshine Coast. The point is that using that argument in community presentations is another example of the misleading nature of the case for the Council’s “Trojan horse” plan and an attempt to wedge the community.

### **6 Are there any other public transport services you think should be included in the Integrated Public Transport Master Plan?**

As previously stated, OSCAR does not support the SCRC's five preferred transit options for a local transit system in the Urban Corridor but does support an option that provides region-wide bus service enhancements operating on new and existing routes with greater frequency, more direct routes and better connections but also incorporating the provision of new technology including a more modern and agile bus fleet servicing the coastal corridor and enhanced the east-west services linking the coast to the hinterland.

The 2021 SEQ Regional Transport Strategy identifies a Frequent Bus Link between Palmview and Kawana SCUH. Assuming there are no significant environmental impacts that stand in the way of developing such a transport route, OSCAR sees considerable advantage in including that as a major project in the Master Plan and as a project to pursue with State and Federal Governments.

It will provide a useful direct link to the SCUH medical precinct and the Birtinya Town Centre for many of the Sunshine Coast hinterland communities and potentially also for Beerwah East residents in the future. It will be a far more convenient and shorter route for many in the

hinterland than alternative routes accessing Kawana SCUH via the Maroochydore to Caloundra coastal urban corridor.

Existing and emerging communications and energy technologies are opening up many innovative ways of tackling car dependency and road congestion and for increasing public transport and active modes of transport. Developments are likely to play an increasingly important role in the transport system; for example, on-demand public transport services, e-bike and e-scooter hire services, online and app-based rideshare and multi-mode transport ticketing and services, major expansions of bikeway, footpath and on-road bike lane networks to support active transport and the increasing popularity of e-bike, e-tricycles, e-scooters and e-skateboards for journeys to work, school, university, shops, sporting and recreation centres.

Other local governments in Australia and overseas are introducing, trialling and promoting these initiatives and we encourage Council to follow suit. The expansion of local and regional pedestrian and bikeway networks should be given greater priority in Council's land use planning, development assessment and infrastructure programming processes.

**7 Do you think the proposed first stage of the mass transit route connects to the right locations? (Choose any one option)**

No – we have addressed this question in our previous responses.

**8 Do you have any comments about the proposed mass transit route?**

**Existing bus routes**

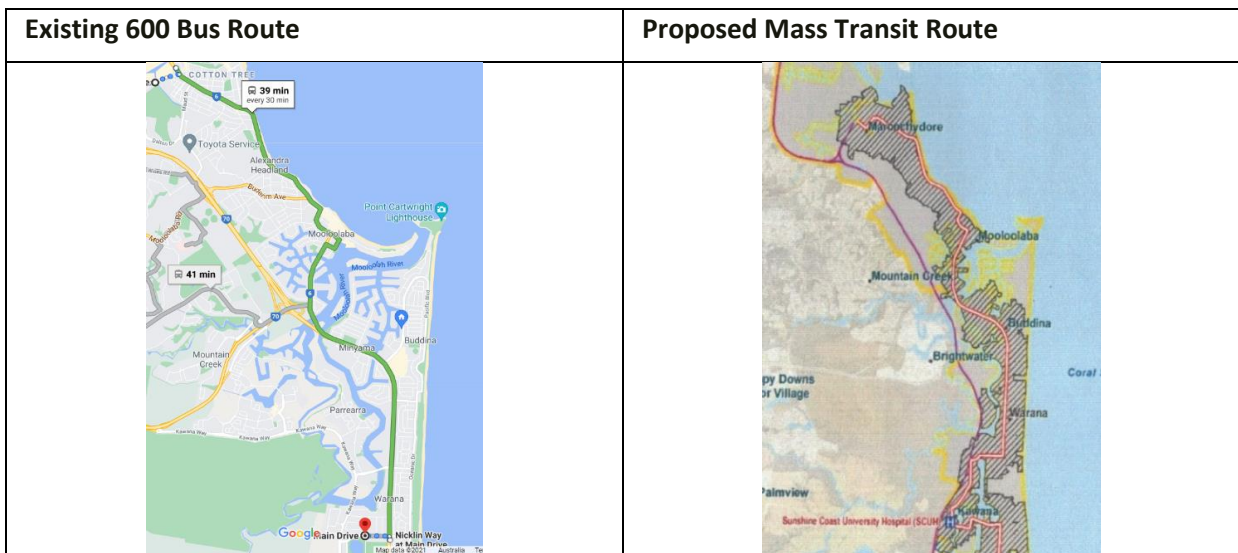
There are currently 2 bus routes (600 and 611) that operate on the proposed mass transit route; for most of the time, the patronage of these two services is low. There is considerable irony in the fact that the MTP proposes the Urban Corridor as its route when this is the one area of the coast currently where a virtual “on-demand” service operates. An analysis of the timetable indicates the 600 bus runs on average every 15 minutes and takes approximately 26 minutes to reach Main Drive. The draft OAR indicates a light rail would run every 7.5 minutes and take approximately 30 minutes to reach the SCUH.

The OAR further indicates public transport usage currently on the Coast is around 3%. Council has set an objective of 10% usage to be achieved by 2041. Conversations with Council officers have indicated for the total region to reach 10% public transport usage, the proposed mass transit route would need to achieve usage levels in the vicinity of 25%.

Patronage numbers provided by the Department of Transport and Main Roads indicate, despite growing population numbers for the region, bus patronage has remained relatively flat both in total for the region and the 600 and 611 bus routes combined. The onset of COVID impacted the 2019-20 numbers however, even before COVID, there was no evidence to show new people settling at the Sunshine Coast are boosting patronage numbers. It seems, therefore, highly unlikely 25% patronage (along the proposed mass transit route) is an achievable target.

Given the mass transit route, which is already well serviced by 2 bus routes that run on similar timetables with similar duration to the proposed mass transit preferred options and are highly underutilized what is the evidence to support favourable behavioural change. This does not seem to be addressed anywhere in the OAR and suggests usage assumptions underpinning the whole business case are flawed.





**The case for excluding the Maroochydore to Mooloolaba section of the Mass Transit (MT) route and using the CAMCOS corridor or Sunshine Motorway corridor north of the Mooloolah River**

Figures 17 and 18 of the 2021 SEQ Regional Transport Strategy suggest that there is no major population and employment growth forecast for this section of the MT route. Population and employment growth within this area is most likely to occur along Aerodrome Road and along the southern section of Brisbane Road, rather than along the Cotton Tree to Mooloolaba beach strip.

The latter beach strip is one of the most iconic coastal areas in the region and is the major centrepiece of both regional tourism and hospitality industries and beach culture for Coast and many SEQ residents. The area is accessed mostly by car, but as previously stated, it is also currently served by the most frequent and convenient bus routes on the Coast serving most of the major activity centres that Coast residents and tourists are likely to want to access.

Funding has recently been made available for the set of Mooloolah River Interchange upgrades, including a direct northbound road from Nicklin Way to Brisbane Rd. Road widening has already occurred on Brisbane Road to Venning Street at Mooloolaba, which will improve car and bus access to the beach strip.

Figure 34 of the draft options study indicates that unlike most other sections of the coastal corridor the Brisbane Rd/Aerodrome Road section does not face any significant volume on capacity ratio issues by 2041.

Furthermore, Action 2.1.7 of the 2021 Regional Transport Plan (see 18.3.2 of the draft options study) identifies a proposed road from Dalton Drive to take southbound traffic from the Maroochydore Regional Centre to an upgraded interchange at the Mooloolaba to Buderim Road. This will divert traffic that currently travels from Maroochydore Centre along Aerodrome Rd, Alexandra Parade and a “rat run” on Pacific Terrace at Alexandra Headland to access the southbound Sunshine Motorway directly onto the Motorway. The proposed new road will reduce unnecessary traffic on the Aerodrome Road to the Alexandra Parade strip, freeing up road capacity and vehicle access to this iconic beach area and assisting the efficiency of local bus services. It will help maintain the amenity of the iconic beach strip.

There appears to be no rationale for the MT route to include the Maroochydore to Mooloolaba section. It is not a major element of the coastal economic corridor and a frequent bus service can continue to provide linkages from that section to regional activity centres.

OSCAR, therefore, suggests that Council and the State investigate ways in which the route of any future coastal MT system can utilise either the CAMCOS corridor or the Sunshine Motorway, and bypass the iconic beach areas so they can continue to serve their regionally significant tourism, hospitality and beach culture functions. CAMCOS was intended to be a multi-modal corridor.

**The draft OAR assesses a wide range of options and recommends that five of those options be further considered in the Detailed Business Case.**

In the OAR it is stated that the preferred options would:

- offer more frequent services
- use vehicles with low emission technologies
- have a flat floor making it easier for people with prams, wheelchairs and mobility aids to move around the vehicle.

Of course, all of these features could be available on a bus-based transit system. This is a good example of how the OAR and the online survey are skewed towards achieving certain outcomes. The OAR often overstates advantages that support the preferred options, or imply stated advantages only apply to the preferred options or are discounted when considering “non-preferred” options.

The first four options are also said to:

- Operate in an exclusive “right-of-way” lane with priority at traffic signals, meaning the vehicles don’t get caught in traffic congestion and offer a very reliable service that runs on time on a predictable route **but this is an advantage that applies to the fixed infrastructure options but at a significantly greater cost.**

It also ignores the disruptive impact on fixed infrastructure options in the event of vehicle collisions, tram breakdowns and possible climate impacts such as coastal inundation. The preferred options do not allow a temporary re-routing of the trams as would be the case with a bus-based system.

- Utilise a raised platform at the stations making it easy to get on and off the vehicle for passengers with prams, wheelchairs and other mobility aids but again, **similar features could be incorporated into the QBC option or in fact to any bus-based transit system that eventually covered the whole region, and at a fraction of the cost.**

## **9 What social, economic or environmental benefits or impacts do you think a Bus Rapid Transit system would have for you?**

We have covered this in our response to previous questions.

The social and environmental benefits of this option can be more than matched by a modern bus-based mass transit system but the economic costs are high and would place a significant financial burden on the region’s ratepayers.

**10 What social, economic or environmental benefits or impacts do you think a Trackless Tram System option would have for you?**

We have covered this in our response to previous questions.

The social and environmental benefits of this option can be more than matched by a modern bus-based mass transit system but the economic costs are high and would place a significant financial burden on the region's ratepayers.

**11 What social, economic or environmental benefits or impacts do you think a Light Rail Transit system would have for you?**

We have covered this in our response to previous questions.

The social and environmental benefits of this option can be more than matched by a modern bus-based mass transit system but the economic costs are high and would place a significant financial burden on the region's ratepayers.

**12 What social, economic or environmental benefits or impacts do you think a Wireless Light Rail Transit system would have for you?**

We have covered this in our response to previous questions.

The social and environmental benefits of this option can be more than matched by a modern bus-based mass transit system but the economic costs are high and would place a significant financial burden on the region's ratepayers.

**13 What social, economic or environmental benefits or impacts do you think a Quality Bus Corridor would have for you?**

We have covered this in our response to previous questions.

The social and environmental benefits of this option can be more than matched by a modern bus-based mass transit system but the economic costs, **while not as high as the other preferred options**, would still place a significant financial burden on the region's ratepayers.

**14 How satisfied are you that the five recommended options are the best options to be further considered in the Detailed Business Case?**

OSCAR is not satisfied with any of the preferred options for the reasons cited in responses to the questions above. We also believe at least two of the non-preferred options have considerable merit and enjoy considerable community support even though they were dismissed in the OAR.

OSCAR agrees that the Council cannot adopt a "business as usual" approach and this has not been suggested by anyone in the community in our view.

The other non-preferred options were not recommended because the OAR claims they would not significantly increase the attraction of public transport as they would still be relatively unreliable, inconvenient and slow; of course, this is only true if no funding is injected into the current public transport infrastructure. Such funding to support the acquisition of a more modern and environmentally efficient bus fleet would cost a small fraction of the Council's preferred options and realise most of the improvements in public transport desired by the community across the whole region.

These options were also rejected because it is claimed they will not effectively reduce dependency on private vehicles or ultimately prevent an increase in traffic congestion but the OAR does not provide any objective evidence that its preferred options will reduce dependency on private vehicles, and due to the fixed infrastructure of 4 of the 5 preferred options, traffic congestion will increase in the Urban Corridor due to the loss of existing car lanes in much of its proposed route.

It also asserted that these options will not substantially enhance the sustainability of the transport system or markedly reduce greenhouse gas emissions. This ignores the fact that a region-wide public transport system based on buses running on renewable energy sources (eg electric, hydrogen and solar) would significantly reduce greenhouse gases.

The OAR analysis consistently skews the benefit/cost outcomes by comparing its preferred options with our existing public transport which is based on large, diesel-powered buses.

The OAR also claims the non-preferred options will not effectively support the projected growth or reduce the pressure for urban expansion but again, no objective evidence for this is presented.

**15 If you are not satisfied with the five recommended options, what would make you satisfied?**

Our response to previous questions makes OSCAR's position on the five recommended options very clear.

**16 Do you think any other option or options should be recommended for further investigation in the Detailed Business Case process?**

Our response to previous questions makes OSCAR's position on an alternative option very clear.

**17 Which of these scenarios do you think would provide the best way of accommodating the new dwellings in the Urban Corridor?**

Independent of the mass transit solution recommended/adopted, the Council's documents (eg Fact Sheet 14) show the current planning scheme comfortably accommodates the population growth to 2041 and the share that has to be taken up in the urban corridor can be achieved under the zoning of the existing Planning Scheme.

There may however be recommendations under Council's design standards as per the Design Book and Placemaking processes that offer better outcomes for the community and genuinely create community hubs.

However, where changes are being sought by Council, for example, the application of Scenarios 1-3 or any other scenario, these should be undertaken within the context of the development of the new PS 2024 and subject to full scrutiny under statutory consultation processes.

**18 What type of placemaking features are most needed in the areas along the mass transit route? Tick as many as you like.**

Of course, the placemaking features identified in the survey are desirable but in all locations, and on any public transit route, irrespective of the form of public transport.

**19 Thinking about where you live, work or visit in the Urban Corridor, what are the things that make these places special? When creating a mass transit system, what should we include in the design of our streets and public spaces that would make them special?**

OSCAR has not addressed this question for obvious reasons.

**20 Stories are a powerful way of understanding the significance of places, why they matter and how they are valued by the community. Do you have a story about a memorable experience or place in the Urban Corridor that you would like to share?**

This question is not relevant to a response from a peak organisation such as OSCAR. This response also applies to the remaining questions in the online survey.

## CONCLUSION

OSCAR does not believe that the preferred options achieve the desired outcomes outlined in the Mass Transit Project proposal. Nor do we believe that it is helpful for SCRC to suggest that the MT project will reduce future greenfield development. There is no guarantee of such and could create a divide in the community – that is, go with the preferred options or have further residential demands on the hinterland communities.

Throughout our submission, we have referenced significant deficiencies concerning costings, environmental, social, cultural and economic implications for both the project and current PS and future PS development.

We have also drawn attention to the fact that recent events, particularly but not limited to, the Mooloolah River Interchange and the strong possibility of SEQ securing the 2032 Olympics have significantly changed the context in which the OAR was developed to date.

OSCAR hopes that the key players from the Commonwealth and State Governments and SCRC determine jointly the transport infrastructure projects that will satisfy the needs of delivering the Olympic Games AND deliver real and long-term transport benefits to the Sunshine Coast and its communities. We expect a united outcome that outlines a programme supported by all levels of government with transparent funding arrangements.

OSCAR recommends that a detailed, independent and transparent impact assessment be undertaken of our concerns before any further development of MT options and the incorporation into the development of PS 2024. Relying on desk-top studies is inadequate and does the Council no credit.

Again, we acknowledge the decision of the Council to undertake community consultation on this project. We also wish to commend the Mass Transit team staff for their commitment to the consultation process.