



Recognising and upholding excellence in local government

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To: Dr David Moore
Sunshine Coast Regional Council (SCRC)

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Dear David and the ELS team

RE: OSCAR RESPONSE to the SCRC Environment and Liveability Strategy Refresh survey

Thank you for accommodating our request for late submission of this response. It is much appreciated. Our response is as follows and has followed the survey form questions and process, with added comments at various points and some general questions at the end of the survey responses.

1. **Emerging issues** across the next 10 years to deliver a healthy environment and liveable Sunshine Coast - OSCAR ranking.

OSCAR PRIORITY LIST
1.Responding to climate change
2 Protecting our natural assets
3 Managing growth
4 Housing affordability and availability
5 Reducing our emissions
6 Growing Healthy and active communities
7 Building a resilient economy
8 Incorporating new and emerging technologies

2. Commentary

Items 3 and 4 are closely linked. However, “managing growth” is more than merely providing houses or places of accommodation. It must include adopting an Ecologically Sustainable Development (ESD) approach to Population Growth and advocating for sensible, sustainable strategies rather than business as usual, which has been and is failing.

Managing growth was something the Planning Institute Australia Qld (PIA Qld) referenced in their report to the State Government Housing summit. OSCAR strongly supports the PIA recommendation that the State develop a Population Growth Management Strategy and a State Settlement Strategy.

Similarly, housing affordability and availability is more than extending the urban footprint and higher density. It is also a nonsense to claim that people buying multi - million-dollar apartments are leaving affordable houses for others to buy. That is akin to the “trickle down economics” concept and begs the question as to how many of those buyers of multimillion dollar apartments are selling houses under 1 million dollars, or between 500,000 and 700,000 dollars, which even then is not affordable for families on low incomes.

Transformational Actions, 2-4 (Inclusive) are a start in this area. In the table of transformative actions, No 3 reference is made to a completed Housing policy, but looking on the SCRC website the only Housing Policy dates from 2009-2023. When is that being updated? One would think it should be well underway and at the point of completion, but as yet to our knowledge there has not been any community consultation on such a topic.

Reference to “growing” healthy and active communities (OSCAR no.6 in the list) is unclear. The intent of this wording is not clear – is SCRC “growing” the communities the intended meaning or is it support for healthy, active and vibrant community growth or similar. It is time that it is recognised that communities are organic and Council’s role is to support community growth, vibrancy and health.

3. Transformational Actions

The Environment and Liveability Strategy’s Implementation Plan includes 26 Transformational Actions. OSCAR suggested Priority actions needed to deliver a healthy environment and liveable Sunshine Coast across the next 10 years are listed in the table following:

Transformational Action	High Priority	Medium Priority	Low Priority
1. Protecting the Regional Inter-urban Break: Protecting the Regional Inter-urban Break in perpetuity to secure the environmental, production and recreation values	x		
2. A better built environment through sustainable design: Embedding sustainable, liveable and affordable design into our built environment that celebrates the subtropical lifestyle of the Sunshine Coast.	x		
3. Housing for the future: Demonstrating that we have the capacity in our urban footprint to accommodate a range of sustainable and affordable living options.	x		
4. Finding the happy medium: Create a street-scale demonstration project to showcase sustainability, good urban design and the benefits of medium density living in partnership with government and industry.	x		

Transformational Action	High Priority	Medium Priority	Low Priority
5. Being prepared: Proactively planning for the potential impacts of climate change and natural hazards to build the resilience of the region.	X		
6. Connecting nature and people: Connecting our valued habitat areas to support our native flora and fauna and providing the community with opportunities to participate in conservation and to experience the natural environment.	X		
7. Protecting the green frame: Securing and protecting the Regional Inter-urban Break and Sub-regional Inter-urban Breaks in perpetuity to frame our neighbourhoods and strengthen the identity of our community of communities.	x		
8. Maintaining the blue by protecting the green: Delivering healthy waterways and beaches that continue to support our lifestyle and livelihoods through integrated catchment management.	x		
9. Stopping the brown from coming down: Partnering with rural, urban and development industries to reduce the impacts of sediment, nutrients and pollutants on waterway health.		x	
10. Celebrating our landscape and character: Identifying and understanding the defining landscapes, character and history of the Sunshine Coast to enable growth and development to be respectful and complementary for the future.		x	
11. A step ahead: Providing for the reinstatement of vegetation and habitats that locally offset the unavoidable vegetation clearing required for our critical public infrastructure.		x Offsets are bad policy producing ecologically unsustainable development. Offsets should be last resort	

Transformational Action	High Priority	Medium Priority	Low Priority
12. Growing the natural economy: Strengthen the economic base around our natural assets and distinctive landscape features by enhancing a network of nature-based and cultural experiences supported by overnight accommodation and day visitor options.		x Planning Scheme provisions foster excess and inappropriate rural development & inappropriate development. in sensitive locations	
13. Healthy coast: Providing a strategic and coordinated approach to the protection, sustainable use and enjoyment of our dunes, beaches, rocky shores and near-shore marine waters	x		
14. Expanding the green space: Securing and activating space for future generations through accelerated strategic land programs to improve conservation, flood mitigation and sport and recreation opportunities.	x		
15. Great places and spaces: In partnership with industry and community develop a network of contemporary places and spaces that provide and support opportunities for creative, community and active experiences.		x	
16. Managing our invasive plants and animals: Providing a collaborative, effective and efficient response to the management of invasive plants and animals to reduce their social, economic and environmental impacts.	x		
17. Greening our neighbourhoods: Delivering cool and shady streets and places to connect and enhance our neighbourhoods and promote biodiversity, resilience and community wellbeing.	x		

Transformational Action	High Priority	Medium Priority	Low Priority
18. An involved community: A major engagement and marketing program to inspire and empower the community to value the environment and play their part in a liveable, sustainable and resilient future.		X Communities and individuals are organic and empower themselves. Government can support, enable, inspire.	
19. Changing our ways: Transitioning the Sunshine Coast to a more sustainable, resilient and low carbon way of living.	x		
20. Switch to a brighter future: Leading the way to a more sustainable Sunshine Coast through social infrastructure improvements.		x	
21. How we live in the environment: Increasing our understanding of how people interact with the natural environment.		x	
22. Zero emissions organisation: Delivering a zero-net emissions organisation and transitioning to a renewable energy future.	x		
23. Attracting sustainable industries/businesses: Strengthening our region's sustainability vision by attracting and nurturing research and sustainable industries and businesses		x	
24. Building our knowledge: Enabling evidence-based decisions for a healthy environment and liveable Sunshine Coast.	x		
25. The living lab: Demonstrating design options and the way we live in self-contained neighbourhoods that deliver affordable and sustainable lifestyles.	x		
26. Kicking goals with living infrastructure: Creating demonstration projects that showcase the benefits and opportunities of the co-location of open space and flood and stormwater infrastructure to deliver complementary natural and built environment outcomes		x	

4. General commentary on the Transformational Actions and associated tasks in the ELS Implementation Plan.

The ELS team is to be congratulated for the details provided in the 3 parts of the ELS. There are also Annual ELS Reports and Annual Environment Levy expenditure reports on the SCRC website. We dare to suggest that there is one missing document or comprehensive table as outlined in the following paragraphs.

For each action a number of tasks have been listed. In trying to assess the future priority actions, we need to understand the process of monitoring, evaluation and reporting of the existing actions. Having looked through the current Environment Levy Annual Report, one can identify expenditures on acquisition of land in key areas, e.g Coochin Creek. Searching the website one finds the completed Outdoor Recreation plan/study for the IUB. The task associated with TA3.2 Prepare *a Housing Policy* - the housing policy on the website is 2009-2023. If that is the current policy which one assumes it is, then it finishes at the end of the 2023 financial year that is in about one month's time. Given the housing crisis in the State and the Sunshine Coast in particular, surely monitoring, evaluating and then updating, renewing, rewriting such a policy would be a priority.

Part C of the ELS – the Network Plan has 198 pages of very detailed information about standards for various categories of activity.

There are expenditure statistics in previous years Environment Levy Annual Reports and snap shots in each year's Environment and Liveability Annual Report, as distinct from the Environment Levy expenditure Annual Report. **However, is there, and if so where, is a comprehensive report of all the actions and tasks as at the time of the Refresh consultation, that is April 2023?**

It is very difficult to assess the importance of the actions in the survey if one is not able to see the assessment and evaluation of the existing actions and tasks, without having to search the Council website for specific information and read the snapshot reports in the ELS Annual Reports.

OSCAR appreciates that the survey is asking whether community members consider that the same transformational actions apply and are there new and/or more pressing actions and what the associated priority might be. We also appreciate that we might be asking the impossible!!

Commentary/questions on specific Issues and Transformational Actions

- i Climate Change(CC) monitoring and response - updates on progress with Climate Emergency declaration; the SCRC/Noosa LG action plan for CC (now on the website); the CHAS; monitoring CC impacts on biodiversity and how to address them (targeting a few key regional species e.g. Endangered turtles /nesting protection; Mary River threatened species); monitoring a few CC health issues (e.g. monitoring heat sink areas or disease vector sites); monitoring coastal erosion in a formal program
- ii Additional biodiversity activities - reporting on implementation of Biodiversity strategy - highlighting positive and negative outcomes and areas where more resources are needed or prioritised - clarifying how this Strategy informs policy and land use planning and development decision-making in Council - how is the Environment Levy used strategically to give effect to the Biodiversity Strategy - is there an Urban and Rural Green Infrastructure Strategy and Plan funded by development contributions and if not, why not?.

- Advocate for Ramsar Wetlands and the JAMBA and CAMBA migratory bird species International Agreements to be added to Nature Conservation Act and the Commonwealth Legislation so can be taken into account in QLD (Toondah, North Harbour and Pumicestone Passage implications).
- iii Open Space Strategy - how will the ELS standards for public parks of various kinds be implemented in the face of pressure for higher densities, especially the Coastal Corridor?
 - iv Transport - how can SCRC facilitate the increased use of EVs and personal EVs (bikes, scooters, skateboards, tricycles)? e.g. by encouraging recharging and secure parking areas at shopping centres, schools and sporting and entertainment facilities and on and off-road bike paths? There needs to be a greater link to the SCRC Transport Strategy.
 - v Community engagement and culture - how can SCRC better recognise and support Beach Culture in its planning and development?
 - vi Constructed Water Bodies (CWB) are referenced in some details as to what should/should not happen, however, there appears to a lack of clarity in relation to some CWBs. One also asks the question, given the details about the construction of CWBs, e.g. depths, how officers could recommend approval of the Twin Waters West Development with a CWB of up to 12 metres in depth? There also appears to be some issues around maintenance of older CWBs.
 - vii There are a number of issues outside of Council's jurisdiction. It is suggested that within the ELS documentation that SCRC should specify in the ELS the role of advocacy to other levels of government.
 - viii One of the measures of the success of the ELS relates to the relationship between SCRC and the community and how the community is responding. This is an important component of the evaluation of the ELS.
 - ix Part B – 5 Year Implementation Plan - Tracking Progress. This contains just one, very broadly expressed Performance Measure for each of the five Strategic Pathways for annual reporting on progress in achieving the ELS. This is a highly selective, extremely limited scope basis for assessing progress of a complex ELS. A set of specific (but once again broadly stated) targets are also given for each of twelve thematic subject areas of the ELS. Each of these are supplemented by several possible indicators of change. Only some of these are measurable performance indicators and others not readily measurable. Furthermore, some of the specific targets can be both useful and misleading as measures of progress e.g. the target for the Biodiversity theme is to *maintain the 2016 extent of native vegetation (no net loss) by 2041*. The overall gross target is acceptable, but it can mask a decline in other aspects of biodiversity (e.g. the extent and quality of critical habitats or Endangered Regional Ecosystem types might have declined or even been lost through edge effects, pet predation, invasive weed speed species and inappropriate “offsets” arising from urban development approvals). A useful related target could be net increases in extent and quality of critical habitat and vegetation communities that have been “over-cleared” in the region (e.g. coastal lowlands).

5. Other general comments from the OSCAR workshop held prior to the consultation process and the OSCAR executive.

- What is the priority of the whole strategy?
- What do we want this region to be?
- Where does it sit in the overall strategy of the Council and how much notice is taken of it, that is what weight does it carry?
- Need for clear objectives and where and how the ELS translates to policy.
- Seems to be more corporate oriented and not enough outward looking.
- Seems to be disjointed with nothing really to connect it.
- How much notice of it is taken by SCRC?
- Needs a statement to indicate where annual/biannual/5-year targets can be found.
- Needs greater commitment to evaluation, including setting targets, monitoring, measuring and reporting. Only minimal detail in the Environment levy annual report to Council and the ELS annual Report only includes some representative snap shots. Some auditing of the process would also be helpful.
- Given the ELS program and the importance of ELS, OSCAR is interested in the funding mechanisms for the program. We understand that overall funding comes from the SCRC Annual Budget allocation, with additional funds from the collection of the Environment Levy. We are seeking advice as to how the Environment Levy is applied across the various rating categories.
- Another source of revenue to fund environment and biodiversity being missed by Council is a dedicated Green Infrastructure Fund funded by development contributions.

6. Age Group - at a guess OSCAR members range in age from 40 to maturity!

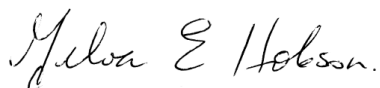
7. Gender this is not something OSCAR follows up. We are members of the community

This submission is made by the Organisation Sunshine Coast Association of Residents Inc. (OSCAR) following an OSCAR workshop held on 1 May 2023 and with additional input from individual OSCAR members and the OSCAR executive.

We thank you for the work you do, your commitment and the opportunity to respond to the ELS Refresh.

Our response is made with respect for that work and commitment.

Yours sincerely



Melva Hobson PSM
President
OSCAR
(Organisation Sunshine Coast Association of Residents)