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20 September 2023

To: The Minister for Planning

Email: [ShapingSEQSubmissions@dsdilgp.qld.gov.au](mailto:ShapingSEQSubmissions@dsdilgp.qld.gov.au)

Dear Minister

**Subject Organisation Sunshine Coast Association of Residents (OSCAR) response to the Queensland State Government *Draft South East Queensland Regional Plan Update 2023*.**

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) appreciates the opportunity to respond to the ***Draft South East Queensland Regional Plan Update 2023***.

OSCAR is a non-partisan and not-for-profit umbrella/peak organisation covering resident and community organisations on the Sunshine Coast and Noosa local government areas (LGAs) in South East Queensland.

OSCAR currently has 35+ active member groups from the Pumicestone Passage to Noosa and from the Coast to the hinterland and ranges.

OSCAR aims to support member organisations by:

- 1 Advocating to local and state government and the public on policy issues that are of regional significance and of concern to our members;
- 2 Acting to resolve issues of strategic or region-wide relevance that are referred by member organisations;
- 3 Representing the member organisations on region-wide matters of interest to the community;
- 4 Maintaining awareness and responsiveness through frequent and regular ordinary meetings and dialogue with member organisations; and
- 5 Practising professional, honest and ethical conduct.

Further information about OSCAR can be found on our website at: <https://www.oscar.org.au/>

Yours sincerely

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

# **Response to the Department of State Development, Infrastructure, Local Government and Planning South East Queensland Regional Plan Update 2023**

## **Introduction**

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) makes this response representing some 35 member groups across the Sunshine Coast and Noosa LGAs.

OSCAR congratulates the consultation team for their commitment, responsiveness and their willingness to spend time with groups and individuals, as well as come around for a second set of consultations.

However, given the quantum of reading across the documents, analysing the information, cross checking information between the 3 documents, we feel that the 30 business days for the response period is far too short for Community groups and Associations.

As well as attending the various webinars conducted by the Consultation Team, OSCAR for example is working with representatives from across our member groups to ensure that they are familiar with the content and process of the SEQRP and have meaningful participation and input into the OSCAR submission. This has included a webinar to introduce the Draft SEQRP 2023 Update and coordinate and participate in discussions and workshops with member groups. Many of our member groups have also made individual group submissions from their members.

Given that we are all volunteers this is proving to be extremely stressful, particularly as it is only a matter of weeks since responding to a consultation process with TMR re the 4 major infrastructure projects across the SC and Noosa. OSCAR has participated in and responded to at least 11 consultations to both State and Local Government in the last 9 months as well as supporting (as correspondents) SCRC's refusal of a Service Station at Pacific Paradise (on the Maroochy floodplain) in the P&E court over the last 4 months and ongoing.

OSCAR congratulates the State Government on most its responses over the last 12 months to the housing shortage in SE Queensland. The key issue is that of social and affordable housing, driven predominantly by the failure of successive governments over the last several decades to provide such. In many respects the reliance on the private market to supply all forms of housing has been a failed experiment.

It has only been recently that the current State Government has taken a serious approach to the housing issue and we acknowledge the acquisition of a range of accommodation types to accommodate vulnerable individuals and families. The purchase and refurbishment of several non-operating retirement villages, the inclusion of manufactured and "tiny" homes and the acquisition of other suitable properties is acknowledged.

However, we have been slow to consider and adopt some housing models and experiences from both Australia and overseas, such as: shared equity housing, build to rent medium density accommodation and better design and standards for medium and high density housing, the failure of which has led to intense community opposition to higher density as seen by their life experience.

The community wants to see better planning decisions re location, siting, distances from the beach, tapered density, protection of biodiversity, open space, green areas and sport and recreation provisions in future higher density dwellings. OSCAR has in its submissions to the State and Sunshine Coast Regional Council called for Master Planning, of such areas where higher density is proposed and which includes the community in the planning.

OSCAR made two major submissions to the State Housing Summit process (included as attachments), one following the summit and the second, and a detailed analysis of the Summit Outcomes. We were extremely disappointed in the response received from the Government, which consisted purely of a standard "this is what we are doing response". We made numerous recommendations on some 20 different housing related issues. Following the summit we undertook an analysis of the Housing Summit Outcomes Document.

Our message to the State Government is that the community is well read, many having had extensive experience in both Local, State and Commonwealth Government, and have professional experience across all sectors of society, public and private. Too often community groups and associations are referred to as “naysayers or Nimby’s”. OSCAR and its member groups believe in acting constructively, criticising where necessary and supporting good decisions and good planning outcomes.

Hence our submission to the Draft SEQRP 2023 update is made. Many people have made contributions and several people have been directly involved in the writing of this submission. This will be apparent in the writing style and for which we make no apology. We are all volunteers!

## **Our approach to the Draft SEQRP**

The response takes the following approach:

1. General comments specifically related to the Draft Plan overall.
2. Comments on each of the 5 Themes – Grow, Prosper, Connect, Sustain and Live.
3. Some specific comments relating to the Northern Sub Region.
4. Conclusion.

## **General comments**

### **Recognising the Update as a significant and ambitious population growth management and planning policy intervention that warrants far more analysis and discussion**

The Update primarily arose from a national crisis in housing availability, diversity and affordability, National Cabinet housing discussions, and the Queensland Housing Summit in late 2022, which commenced a State Government response to the crisis in Queensland, and SEQ in particular. The housing crisis has been decades in the making and it will likely take decades to rectify supply, diversity and affordability issues. The crisis arises from a variety of state and federal policy and market failures, and planning and development policy intervention is an important and key component of a wide range of measures required to address the crisis.

Ideally, there needs to be well-considered and integrated short, medium and longer term responses to the crisis rather than ad hoc emergency responses that could prove to be wasteful of public resources, unnecessary, ineffective or have unintended inappropriate outcomes.

Finally, the crisis has come to a head in the context of the Covid pandemic, which has had far-reaching effects on migration patterns, how and where we work, and where and how we want to live. These factors are still playing out with unknown outcomes in many cases. Monitoring these factors is essential to ensure the SEQRP reflects emerging trends. Another major driver of the crisis and the Update has been the recent series of devastating natural disasters, and the associated realisation that the planning and development system has not prepared communities appropriately for the emerging natural hazard and Climate Change impact situations. The Update continues the State’s failure to address and resolve these issues. The State and SEQ also faces biodiversity, health and Budget crises, and significant demographic changes. All these factors complicate attempts to address the housing crisis, but need to be addressed irrespective of the housing crisis itself via significant amendments to the draft Update.

While the Update is not described as a Review of ShapingSEQ2017, it in fact represents one of the most significant strategic planning policy interventions ever made in the history of regional planning in SEQ and indeed in Australia as a whole. It commits to accommodating a population of 6 million in the region by 2046 primarily through increasing residential density in the Consolidation areas of the existing Urban Footprint (target 70% of population and dwellings growth) and 30% of growth in greenfield Expansion areas. The Update accepts that about 80% of the increase in State population will be accommodated in SEQ. About 34,500 new dwellings will be required each year (a total of 900,000 by 2046), which will need to be matched by increased water supply, additional infrastructure and services of all kinds, and additional business and job creation.

There can be no doubt that this is an extremely ambitious population growth and housing supply and diversity management intervention. Planning to accommodate an additional 2.2M people over the next 23 years is a far more challenging task than the 1.4M population increase accommodated in the preceding 22 years. The projected 6M by 2046 comprises about 5.3M in the Greater Brisbane Region, which equates to the current populations of the Greater Sydney and Melbourne Regions, plus about 700, 000 in the SEQ Northern sub-region , which includes the Sunshine Coast and Noosa Council areas.

As the Sydney and Melbourne regions have the highest property and rental prices in Australia and arguably the most significant issues with housing affordability, congestion and urban liveability, it is reasonable to question whether SEQ will also have those same characteristics as we progress to 6M – despite the proposed significant planning policy interventions.

Given the scale and ambition of this policy intervention, it is also reasonable to question whether that is in the best interests of the existing residents of SEQ, whether that is a future that they want, and what other scenarios and policy interventions could be explored that might have better outcomes and community support than what is proposed in the Update.

Limited stakeholder consultation occurred prior to and after the Housing Summit, and there has been a short statutory public consultation and submission period on the Draft SEQRP Update, including face to face and online discussion with State planning staff and online feedback.

However, OSCAR considers that a far greater level of engagement with Local Government and the SEQ community over a longer timeframe is warranted given the implications for Councils and regional communities of the Update's proposed significant planning interventions. The State is essentially proposing to impose a set of mandated performance requirements on Councils, industry and communities for dwelling supply targets; diversity and affordability sub-targets; minimum density; maximum onsite parking; canopy cover; open and green space; and various design outcomes. There needs to be much more dialogue about where and how this region-wide transformative urban infill intervention is to occur.

OSCAR accepts the need for the paradigm shift to increased density, but we ask the State to work with regional communities and Councils on the details of this transformation.

### **Empirical evidence for the Update strategic planning policy – ensuring SEQ regional planning incorporates evidence-based best practice planning**

#### **New MULTI methodology**

The Model for Urban Land Use and Transport Interaction (MULTI) has replaced the former Land Supply and Development Monitoring (LSDM) methodology for measuring population growth, estimates of dwelling supply and demand in Consolidation and greenfield Expansion areas, and estimates of supply and demand for Industrial land over various timeframes. The MULTI dynamically integrates economics, transport modelling, demographics, and land use planning factors to test growth scenarios across SEQ for planning and decision making (see factors in Table 1, P 17 of Update).

In relation to Supply in Table 1, OSCAR questions how land banking, not proceeding with development applications, not implementing development approvals and deliberate withholding of land, lots and dwellings from the market are addressed? Clearly these measures are all aimed at market manipulation and profit maximisation, but they confound aspects of MULTI as well, and result in adverse impacts on housing availability, diversity and affordability. These actions are especially damaging where one or two development companies dominate a market and can exploit that situation. What steps can and will the State take to identify and intervene in such market manipulation situations?

OSCAR welcomes this attempt to improve the range of factors used in planning SEQ, especially the intent to use more, regularly updated data to better integrate land use and transport infrastructure and services planning, and planning for other infrastructure and services.

Given the significant role MULTI will play in determining planning, development and infrastructure provision and guiding the supply, diversity and cost of housing, OSCAR proposes that the performance of the MULTI methodology be regularly monitored by a panel of independent experts, and amended where necessary.

Furthermore, as the inputs and outputs of MULTI are in the hands of governments and presumably the development industry, there is limited transparency and accountability. OSCAR therefore requests the State to release details about how the information used for planning and development decision-making will be made publicly accessible.

Finally, compared with the most recent LSDM figures, application of the MULTI has produced new higher population growth projections for SEQ, and identified a need for significantly more dwellings, and in particular a shortfall in the supply of attached housing in the Consolidation areas by 2046.

OSCAR accepts the overall outcomes of the MULTI model for planning purposes, including the medium scenario population projections in Fig 4 on P 68 and the dwelling supply targets to 2046 in Fig 5 on P 77.

We note that the SEQ population growth rate will be strong to 2026 after which it will be slower on average. As SEQ property prices appear to again be rising and rental vacancies remain close to record lows, we suggest that State policy and the SEQRP Update needs to include greater focus on identifying short-term, effective actions to address supply, diversity and affordability.

#### Queensland Conservation Council Best Practice Regional Planning Report

OSCAR broadly supports the analysis and recommendations of the Best Practice Regional Planning for SEQ report prepared by SGS Economics and Planning for the Queensland Conservation Council (copy attached). This report draws on a range of Australian data, research and planning approaches in various jurisdictions. It amply makes the overall case for focusing legislation, policy and implementation on infill increased density development within the existing SEQ Urban Footprint rather than new Greenfield development. The report concludes that more lots and dwellings are likely to be delivered earlier and at far less cost through infill, increased density in the Consolidation areas compared with Expansion areas, and that there is a need for more focus on “gentle density”/missing middle attached dwelling types.

However, the SGS conclusions and recommendations are a fairly general framework, and as always the devil is in the detail.

#### Analysing the Australian and global experience with upzoning & onsite parking planning reforms

SEQ is not alone in dealing with rapid, sustained population growth and housing supply, diversity and affordability issues. Planning reforms to address these issues have been undertaken by a number of cities, regions, states and provinces around the world in recent years – including Sydney, Melbourne, Auckland, Minneapolis, Spokane, Toronto, Portland, Seattle, Chicago, California. A common feature of these reforms has been to lift zoning density away from low rise, low density, detached housing to “gentle density”/missing middle attached housing and to Medium and High rise density at suitable selected locations – with and without reductions in onsite parking requirements aimed at promoting public and active transport.

A polycentric / integrated transport and land use regional planning strategy is also a common feature of the proposed SEQ and the Greater Sydney and Melbourne Region plans (see The 2018 *Greater Sydney Region Plan: A Metropolis of Three Cities* and *Plan Melbourne 2017-2050* ).

Housing economist Cameron Murray has questioned claims about positive outcomes of the city-wide upzoning intervention in Auckland, while a MIT report apparently found that upzoning reforms in Chicago did not increase housing supply but prices did increase. Another Australian economist Matthew Maltman, who has commenced an upzoning tracker website (<https://onefinaleffort.com/upzoningtracker>) analysing results from planning reforms around the world, is extremely positive about the outcomes achieved by these reforms.

Given the limited time most of these various planning interventions have been underway, it might be premature to attempt to draw too many firm conclusions about their performance at this early stage.

However, the State is embarking on one of the largest and most ambitious planning reforms ever undertaken at a regional scale anywhere in the world and several policy and implementation elements are yet to be finalised.

OSCAR recommends that the Queensland Government would be well advised to see what learnings can come from the Sydney, Melbourne, Auckland and various other overseas planning reforms to date. i.e. by investigating what problems were being addressed, by what means, and with what outcomes. What has worked and failed and why? Who has benefited and who has not?

OSCAR further recommends that the State enlist as soon as possible an expert panel of academic economists, land use and transport planners, legal and housing and environmental specialists to review Australian and overseas experience and provide advice on finalising the policy, legislative and implementation details of the Update so that it incorporates best practice, fit for purpose regional planning arrangements. If the State decides to proceed with its Update interventions without waiting for that advice, OSCAR proposes that the State amend its policy and implementation mechanisms once the panel has completed its review and offered its advice. Such an expert panel should be added to the proposed Governance framework.

### **Alternative and Complementary Strategies and Short-term Actions**

- (i) Is it possible to slow the rate of population growth into Queensland and SEQ so we can catch up with the current backlog of infrastructure and services and do thorough, evidence-based planning for sustainably managing the additional growth?  
  
e.g. Page 67 of the Update indicates that about 38.7% of new residents will be overseas migrants (compared with 25.4% interstate migrants and 7.8% from elsewhere in Queensland). Immigration is Federal responsibility, but the State can advocate for levels of migration and the age and skill sets of overseas migrants that better match State workforce requirements now and in the future, and match our capacity to supply affordable housing to migrants. Forecast rapid growth to 2026 is mainly driven by immigration, so this justifies an immigration focus in the short-term and beyond.
- (ii) Is it possible to encourage prospective interstate and overseas migrants to consider moving to regional Queensland centres or small towns by pointing out the advantages of these alternatives to SEQ?  
  
e.g. OSCAR continues to support the Planning Institute of Australia ( QLD Branch), which is advocating a State population settlement strategy and a population growth regional dispersion policy. This is based on more cost-effective use and supply of infrastructure and services across the State, and sustainability, liveability and economic development considerations, as well as the various potential benefits to regional communities across the State. The State can strategically plug the gaps in infrastructure and services in regional centres so that they can offer all the necessary education, health, communications and community facilities and employment opportunities to make regional Queensland an attractive alternative to SEQ. The positive living advantages of regional centres can then be promoted through websites etc.
- (iii) Is it possible to identify short-term actions that can quickly supply more lots and dwellings to address the availability, diversity and affordability of housing in SEQ – thereby permitting more discussion with Local Government, industry and the SEQ community aimed at reaching agreement about a full suite of regional and local planning strategies and measures? e.g. the State has already amended the Planning Regulation in relation to rooming houses and secondary dwellings.

Other areas warranting early action to address the crisis include:

- \* ramping up production of manufactured houses in SEQ, including the State ordering dwellings for social and affordable housing projects in SEQ
- \* encouraging the expansion of the manufactured /modular housing industry and the establishment of more manufactured home estates

- \* continuing to identify State and Council unutilised or underutilised land and properties suitable for dwelling sites or repurposed for dwellings
- \* development permits for caravans and tiny houses to be located on urban and rural lots for one or two years where appropriate water, wastewater, waste, electricity services are available and local amenity and biodiversity is not impacted.
- \* discouraging short-term accommodation such as BnBs, which reduces the availability of long-term rental and owner-occupier dwellings – recent UQ research reported in the Brisbane Times on 15 September found that 13,300 dwellings in SEQ were actively used as BnBs, mainly in tourist destination areas like Noosa and the Gold and Sunshine Coasts. E.g. punitive rates, registration restrictions, requirements to permit the use only in appropriate zones or where managed by an owner-occupier could all help move a proportion of these dwellings to the permanent or semi-permanent rental market or to owner-occupiers.
- \* identifying and rectifying why 60,000 approved lots in SEQ have not been developed and placed on the market ( a point made by Mayor Jamieson at the Housing Summit). This might have been fully or partly addressed as part of the review of Underutilised Urban Footprint ( see P 72 of Update) but it could also be deliberate land banking and withholding supply of lots to market.
- \* action by State Development, EDQ and Councils to follow-up on the review of the Underutilised UF. E.g. about 20,000 hectares (73 per cent of the 75 reviewed parcels) could be developed with appropriate intervention. Priority could be given to pursuing those interventions so the lots or dwellings concerned can enter the development pipeline asap.
- \* action by EDQ to require social and affordable Inclusionary housing targets in PDAs and MDAs to be met. E.g. it is understood that no social housing and very few affordable houses have been developed at the Stockland Caloundra South /Aura PDA despite having 13,000 approved lots
- \* action by State Development and EDQ to bring forward the development and supply of lots and dwellings where there are no infrastructure and services impediments. E.g. PDAs and MDAs where the supply of product is withheld for marketing and profit maximisation reasons. The Stockland Aura PDA has about 4,700 built houses out of 6,500 house permits on 13,000 approved lots out of the total 20,000 lots. Stockland is understood to intend building only 1,000 new lots per year whereas an average of 3,500 new dwellings are required per year on the Sunshine Coast.
- \* action by State Development and Councils to require the implementation of existing development permits where there are no impediments to doing so e.g. “sleeper” development permits that Councils have allowed to be rolled over again and again rather than be commenced and completed. There are cases on the Sunshine Coast of decades old permits.
- \* action by State Development, EDQ and Councils to review incomplete PDAs, MDAs and other master planned/staged communities to determine if there is scope for attached housing at various densities instead of planned detached housing. Around 20% proportion of identified attached housing potential could be Inclusionary housing. Where feasible, government could initiate or facilitate fast development approval amendments.
- \* amending the Planning Act and Regulation to require all new development permits to include timeframes within which development milestones must be met ( including commencement dates and sunset clauses) in order to avoid cancellation of the permit or punitive penalties. This reform will have short and longer term benefits to speeding up the supply chain, including staged developments. Consideration could also be given to making this retrospective.
- \* quickly clarifying policy definitions of social, community and affordable Inclusionary housing and Build to Rent housing and decide the proportions of a development that must meet those definitions for planning and development permit purposes. Make appropriate legislative changes (probably via the Regulation) and expedited Planning Scheme amendments so that these housing forms can be delivered as soon as possible. OSCAR does not support relaxations or other concessions to

incentivise these housing forms. It is important that the development industry come to accept these housing forms as a routine responsibility in their business models asap.

### **Better infrastructure funding and coordination implementation arrangements**

The attached SGS report on best practice regional planning identifies better coordination of the provision of transport and other infrastructure and services with land use planning as a major determinant of successful infill development that delivers the supply of additional affordable and diverse housing, economic outcomes and well designed and located liveable communities.

This is a major conclusion of the SGS report and of the Draft SEQRP Update – especially the delivery of region-making road, rail, public and active transport infrastructure to achieve connected and compact urban development in the region. The synchronisation of transport infrastructure and infill and Greenfield urban development and funding certainty for that infrastructure provision has been a major problem to date for regional planning in SEQ and indeed across the State. While the Update, the SIS and the SEQIS seek to address these problems, there is no detailed program about how the State intends to fund critical infrastructure requirements to deliver the housing and other outcomes it wants.

Section 2.6 Figure 12 of the SGS report proposes a suite of development contributions to provide funding for infrastructure including - User pays charges, Impact mitigation payments, Value sharing requirements, and Inclusionary provisions. OSCAR recommends an urgent review by the State of developer and development contributions using the Figure 12 model. Our experience suggests that there will indeed be a need for the State to plug the gaps in Inclusionary Requirements and Value Sharing in particular, probably via legislative amendments, planning instruments, planning policies and development assessment requirements, including:

- (i) Land values reflect a “highest and best use” principle. E.g. Upzoning from a single detached house to multiple attached dwellings creates the potential for substantial appreciation in land values that accrue to the landowner/developer concerned at present. The State and/ or Local Government can share in the increased land value arising from an upzoning by mechanisms such as a progressive Land Tax or via taxing a percentage of the realised capital gain once development permits are issued and the development is undertaken. This has enormous potential to fund a variety of infrastructure and services programs in the future.
- (ii) Chronically strained Federal, State and Council budgets mean that planning and approval of urban development often occurs out of sync with delivery of the necessary supporting infrastructure and services. Reviewing and reforming all four of the above development contribution streams will be necessary to achieve genuine integration of land use planning with planning for delivery of the required infrastructure and services. Regional and local land use strategies can only be successfully realised when they are aligned with State and Regional Infrastructure Strategies and Council Infrastructure Programs – and that means Budgets must have the capacity to fund the Infrastructure Strategies and Programs.

OSCAR requests the State to commit to integrated, synchronised planning and infrastructure funding principles, and not to require or permit increased density land use planning and development that is out of sync with infrastructure funding and delivery.

- (iii) OSCAR considers that Infrastructure must lead growth and not follow it – infrastructure first, increased density development second.  
This is especially important for the four so called region-making transport projects on the Sunshine Coast. All four are at the detailed planning stage, but are yet to proceed through the Business Case process, after which their funding applications to Federal and State Governments and possibly Council will also need to be successful. This will take several years and success often depends on Bipartisan support, which is not evident for these Sunshine Coast projects. The transport infrastructure works will also take many years to commence, let alone be completed.

In these circumstances OSCAR is opposed to any medium and high density land use changes being incorporated in the proposed new SC Planning Scheme unless there is funding and construction



certainty. There might be a case for the new Scheme to include some medium and higher density development at the higher end of the centres hierarchy where such development is already envisaged in current planning (such as Maroochydore CBD, Kawana Shopping Centre REC, the Birtinya Health Hub/Town centre REC, the Caloundra REC, and possibly the Aura Town centre and the Nambour District centre.)

Accordingly, until all or sections of these four projects are delivered, the scope for medium and high density development will be constrained. “Gentle density” development is therefore likely to offer the greatest scope for increased density in the Northern sub-region of SEQ until the region-shaping infrastructure is delivered to support new medium and higher density. However, any “gentle density” development should not be predicated on access to region-making transport infrastructure unless there is certainty regarding funding and timing of delivery of the infrastructure concerned. Approved “gentle density” should also not compromise establishment of the region-making transport infrastructure nor any future medium or higher density development associated with the transport concerned.

- (iv) quickly clarifying how Inclusionary requirements are defined, specified and mandated is extremely important given this is a major key for unlocking social, community and affordable housing supply. Matters that need clarification include:

- \* what is an appropriate percentage of Inclusionary housing - 20 to 30% of dwellings? Should it be a progressively higher percentage the larger the development project is?
- \* what is an appropriate target for social housing? Numerous AHURI and other academic studies exist for guidance. A good starting point is to look at current social housing waiting lists in QLD and SEQ as a target for supply numbers and as a percentage of all housing stock. Similarly for community housing waiting lists. Special attention needs to be given to First Nations demand for social housing in SEQ given the level of comparative disadvantage and high proportion of first nations people in QLD living in SEQ.  
  
Element 4 (a) on P75 indicates AHURI is to advise on an appropriate level of social housing to be included in the finalised Update. OSCAR supports use of such academic expertise.
- \* how is affordable housing to be defined? Objective benchmarks are required.
- \* what is the appropriate split between social, community and affordable housing?
- \* how will household and dwelling size be addressed to Inclusionary housing requirements?
- \* should co-operative housing requirements be included in Inclusionary housing? Or should separate requirements apply? OSCAR notes that co-operative community housing and co-operative housing estates have not been addressed in the SEQRP Update despite these being a significant part of housing stock supply, affordability and diversity in many European countries and are becoming increasingly popular elsewhere.

## THEME COMMENTS

### Grow Elements and Strategies (commencing P 74)

**Element 1 – Efficient land use** – OSCAR generally supports the approach but questions the proposed dwelling density targets in 1.3 (Table 4 P 80) and 1.4.

- \* it is inappropriate to impose upper level minimum densities for a Principal Regional Activity Centre such as Maroochydore CBD equal those in Singapore. SEQ is not subject to the land availability constraints of Singapore. Land development is a heavily controlled government function in Singapore with the strong ability to deliver design done well. Such High densities are unlikely to be in keeping with the character and current amenity of nearby areas, even in inner urban or other CBD situations of SEQ.

- \* P 80 lists 5 major attributes of High Amenity Areas where minimum densities would be imposed. To those we would add accessibility to local employment, child care centres and other community facilities, and active transport infrastructure and sports grounds and facilities. (The state should remember that Council Planning Schemes and Infrastructure Strategies and Programs have service level requirements for matters such as these to which development applicants make contributions as part of development permit conditions. The range and level of contributions reflects the scale and impact of development and the demand it creates for infrastructure and services supporting development). The SEQ Update refers to canopy cover requirements for different densities, which are also relevant considerations.
- \* access to a PRAC or a MRAC or high frequency public transport/ stops is a useful tool for identifying where increased density is potentially appropriate. However, satisfying these locational criteria as in Table 4 does not necessarily mean that the community has access to all of the infrastructure and services of the kind required to match the proposed densities and that development at these densities is able to realise the Update's stated intention to have "density done well".
- \* OSCAR therefore recommends that the minimum densities in Table 4 should be converted to maximum densities and a pre-condition for permitting maximum density must be the ability to satisfy the 5 High Amenity attributes on P 80 plus the additional service standard requirements in Council Schemes and Infrastructure Programs, and matters such as canopy cover.
- \* however, planning concepts such as the 20 minute neighbourhood also have to be considered, as well as community perceptions of acceptable building heights, which are likely to vary from one part of SEQ to another. On the Sunshine Coast buildings 3 to 6 storeys seem to be regarded by the community as Medium Density and anything greater than 6 storeys is regarded as High rise density. To help limit court disputation SC Council uses building heights rather than storeys as well as site cover and setbacks to regulate densities and design considerations. The State should consider these more quantitative measures for planning and regulating densities.
- \* an additional pre-condition should be compliance with minimum canopy cover requirements in the locality or zone concerned, and the retention of major established shade, character, culturally significant and high biodiversity maintenance trees and shrubs. The latter vegetation cover and urban waterways and wetlands also play an important role in maintaining biodiversity and ecological processes in urban areas. Maintaining wildlife in urban areas is important.
- \* all things considered, OSCAR therefore recommends that, rather than impose a standard dwelling density or storey requirement in the revised Update, Councils should be able determine minimum or maximum levels through consultation with local communities. The spatial elements and benchmark rules for medium and high density development should be determined through neighbourhood, precinct or local area plans. Where several new medium or high density developments are required, such as along a new public transport corridor, a Master planning process should be used. All of the High Amenity factors discussed above should be included in planning and setting benchmarks for development approvals.

## **Element 2 – Housing supply**

OSCAR does not have access to information to enable us to decide whether the draft dwelling supply targets in Fig 6 on P 77 are accurate, realistic or acceptable to the community. We would need to have discussions with the SC and Noosa Councils to decide the matter. However, we note that Noosa Council has expressed public concerns about how realistic the target is in their situation.

We are nevertheless prepared to support the proposed shift to 70% Consolidation/30% Expansion supply targets.

The major mechanism for planning and delivering the housing supply targets in Fig 6 are in the short to medium term Council Housing Supply Statements covering supply plans for 2026, 2031 and 2036 and Council

Housing Strategy and Implementation Plans. Both will be assessed and approved by State Development and play a major role in preparing planning instruments and development assessment benchmarking.

During consultation on the Draft SEQRP Update, State Development is working with state agencies and Councils to develop their Housing Supply Statements. It would appear that this timeframe will not allow time for Councils to consult their communities or relevant stakeholder groups. Given the significance of these Statements and the consequences for planning and development decisions OSCAR recommends that the process be slowed to permit community consultation by Councils.

Of further concern is P 85 which indicates that the State could require streamlined Planning Scheme amendments and other regulatory mechanisms to materially improve housing supply, diversity and/or affordability. E.g. using the Minister's rules for scheme amendments and the planning regulation.

OSCAR accepts there is a housing crisis, but we have earlier indicated a large number of actions that can be taken to start addressing the problems, and there can be no justification for not permitting community engagement on these Statements and on possible Scheme and Planning Regulation amendments.

OSCAR supports Element 2.2 and 2.3.

### **Element 3 - Housing Diversity (P84)**

Fig 6 on P 84 indicates the housing diversity targets for each Local Government in a pictorial way, but not in a quantitative way. The detail will be included in the finalised SEQRP Update and then presumably included in the above Housing Statements etc.

The target for Noosa is a significant drop in low density attached housing, a significant increase in low rise attached housing to 3 storeys, and a small rise in attached medium rise apartments to 8 storeys.

Sunshine Coast target is a fairly significant drop in low density attached housing, a significant increase in low rise attached housing to 3 storeys, a small rise in attached medium rise apartments to 8 storeys, and a small rise in high rise attached apartments in excess of 8 storeys.

OSCAR suspects that these SEQRP Update proposals for Medium and High Rise will generally not be acceptable to the Noosa and SC communities, not to the Noosa Council, and probably not acceptable to the SC Council either. This partly reflects the intent of Councils and communities to avoid looking like the height, bulk and density of Gold Coast development, as well as different interpretations by the Coast community of what low, medium and high rise development means and looks like.

There is potentially also opposition to 3 storey versions of Gentle density in many situations, especially in hinterland communities.

As indicated in relation to Element 2, there will be no time for the community to be consulted by local Councils and no time for Councils or the community to have effective dialogue with the State. OSCAR is totally opposed to unjustifiably rushing these proposals through without appropriate genuine consultation.

P 85 requires Councils to review:

- \* the category of development assessment for Gentle density (i.e. code assessable at a maximum in all residential zones where local government have engaged with their communities on strategic planning for the area), and

building height requirements, assessing potential to allow up to 3 storeys in the low density, low-medium density, or general residential zones

OSCAR totally opposes an Accepted development/ as of right/ no application required assessment level for Gentle density and 3 storeys

OSCAR will accept Code assessment, but only where an effective community consultation process has occurred at a high strategic level (P Scheme) and at a more meaningful targeted neighbourhood, precinct or local area planning level, and only where Council also has an online portal for the public

to access current development applications so that the community can make an unofficial submission to Council (e.g. SCRC development i website)

OSCAR opposes Code assessment and favours Impact assessment where 3 storey Gentle density is proposed in inappropriate locations such as character and heritage housing areas, sensitive landscape scenic areas such as escarpments, and predominantly single and two storey detached housing areas in rural towns and villages.

OSCAR favours Impact assessment for all Gentle density and 3 storeys that cannot comply with important sustainability code Acceptable outcomes relating to renewable energy, energy efficiency design, sustainable design etc e.g. not overshadowing rooftop solar PV and hot water, rooftop gardens, north facing windows, vertical living gardens on neighbouring properties.

- \* car parking requirements, with a view to remove minimum car parking requirements, and provide maximum car parking requirements in accordance with best practice for urban planning nationally

OSCAR opposes the move to impose maximum onsite vehicle parking requirements. This might be appropriate in inner city metropolitan Brisbane and other locations very well served by frequent, rapid public transport and with ample amenity at hand. It is not appropriate for the vast majority of the SEQ Region where high levels of car dependency are inevitable because of the dispersed settlement pattern, long travel times to destinations, and no or poor public transport. Poor past planning has produced a legacy of narrow and badly designed roads and low onsite parking requirements relative to the number of dwellings, bedrooms and occupants per lot, which has produced on-street parking congestion, safety issues, and even access issues for garbage trucks and emergency services vehicles. The popularity of recreational vehicles, campervans, trailers etc. also create issues. Densification when combined with maximum on site car parking will have many adverse impacts, including amenity, which the State cannot ignore.

- \* design requirements for medium density development and identifying critical design elements that improves amenity and encourages good quality design,

OSCAR seeks further information and public consultation as these will be critical for achieving Update intended outcomes. We are concerned that standardised requirements will be imposed, when there is clearly a need for local or sub-regional differentiation in Codes and standards, which can only be determined via genuine public consultation and engagement by Local Government.

- \* encourage gentle density development through financial incentives or other planning levers (density bonuses, planning concessions, impact fees).

OSCAR totally opposes incentives for Gentle density, medium and high density and Build to Rent. The sooner the development industry understands its responsibility to improve its performance and adjusts its business models, the better.

High Amenity Areas, minimum dwelling density, building storeys/height, and diversity were addressed in relation to Element 1 above and in relation to development contributions to fund infrastructure and services earlier.

Many of the points made in Element 1 also relate to Gentle Density.

“The term “gentle density” refers to the gradual, incremental approach to development that limits abrupt changes in scale, density, or character that might disrupt existing communities.” (P82)

OSCAR requests the State to explain how it intends to “limit abrupt changes.....that might disrupt amenity”. This is at odds with the Update proposals to fast track this style of development by Code assessment at a maximum, allow it in all residential zones, introduce maximum onsite parking requirements, and provide “planning certainty for industry in the delivery of this product”. This will very probably continue production of poor quality, low amenity dwellings that do not respect locational nor cumulative impact considerations. There will be no limits and there will be disruption of amenity.

OSCAR requests the State to explain why the take-up of Gentle density has been so slow in SEQ. We suspect that there has been too much low quality, low amenity product delivered by the industry that there is market resistance to it. The task for the State and the industry is to produce some high quality product that will encourage community sentiment to change.

The Update proposals are intended to fast track this style of development and this will very probably continue production of poor quality, low amenity dwellings that do not respect locational nor cumulative considerations.

OSCAR is also concerned about the feasibility of maintaining let alone increasing levels of canopy cover, open and green space, availability of active and passive sporting and recreational facilities as density rises via Gentle, medium or higher density.

If there is no roadmap to achieve these outcomes, how will we avoid heat sinks, health related Climate Change impacts, the obesity epidemic, mental illness, social isolation and disadvantage etc?

Without a roadmap, we will progressively lose or diminish the character of traditional low density, detached houses with backyards and gardens that are suitable for families in leafy suburban areas. Densification in SEQ is needed and inevitable, but how do we keep some traditional family home suburbs so that this part of housing diversity in SEQ continues to be available and thrives?

Questions such as these should not be reduced to lowest common denominator public debate about NIMBYS (v) YIMBYS!

OSCAR has a few suggestions on such a roadmap to densification and retaining the suburban detached house as well:

- \* Start a conversation and engagement process with community members, now about housing issues, population growth and density. Use traditional and social media. Participate in well-attended shows, exhibitions and other like venues and have stalls and displays. Listen to the views of the community.
- \* Encourage the public to visit or view online good examples of “density done well” and Build to Rent. Produce some videos and podcasts.
- \* Run competitions for best “density done well” and Build to Rent. Get the Architects and Planners to showcase their skills. Have some panel discussions to unpack the good, the bad, and the ugly.
- \* Undertake effective neighbourhood, precinct or local area planning and Master planning in some cases to guide the transformation and have community acceptance of the change. Include programs to fill gaps in or scale up infrastructure and services
- \* Direct Gentle and other densities towards some suitable locations where the local amenity cannot be too adversely impacted initially and there are adequate amenity values to support the density transformation initially.
- \* Progressively make cost-effective infrastructure and services investments that raise amenity, liveability and accessibility as transformation occurs.
- \* Focus on a few strategic place making and community building investments.
- \* Set a total proportion of the locality that is available for densification and aim to distribute these dwellings as well as possible across the locality. Monitoring and adjusting distribution will be essential. Slow change rather than abrupt change is essential.
- \* Set rules about site cover; front, back and side setbacks; canopy cover; area of green vegetation; retention of mature trees and shrubs; undercover and open car park spaces that promote amenity and liveability.

- \* Ensure streets, footpaths, active transport and public spaces are safe, attractive, user friendly, leafy, and encourage social interaction and wellbeing.
- \* Ensure some natural environment and vegetation is retained or created to maintain or re-establish local biodiversity and wildlife.
- \* Reserve as high a proportion as possible of current low and low-medium density zoned suburban housing areas as Protected Housing Precincts where there can only be houses and low rise dual occupancies (SCRC Planning Scheme has such a Precinct). Transition these areas to higher density if and when demographic changes and community perceptions change.

#### **Element 5 - Growing rural towns and villages**

(Rural towns and villages provide for sustainable growth and community development in a way that reinforces local identity)

- 5.1 Enable an appropriate growth within rural towns and villages where supported by existing infrastructure and in a manner that avoids the fragmentation of productive rural land. OSCAR is inclined to accept this proposal but only on the basis proposed. We request further detail be released about how this would be done and what factors would be considered before we would support it.

However, we note that it is not consistent with the proposal in the Department's Consultation Paper on proposed amendments to the Planning Regulation, which is available for public comment alongside the Draft Update consultation. The State needs to clarify if this is the same proposal or a different one.

Planning Regulation – Schedule 10, Part 16 - Proposed change to the current Prohibition of subdivision to produce rural subdivision precinct lots in the SEQ RLRPA adjacent to existing rural towns and villages. The proposal is to allow a Council to process such a rural subdivision proposal, including a public consultation process, and submit it to the State for approval.

OSCAR members in the hinterland opposed this Regulation amendment on the basis that the SEQ plan reviews and updates are the appropriate vehicle for identifying changes to the urban footprint in all rural towns and villages in SEQ. This proposal is somewhat of a backdoor mechanism and does not provide appropriate levels of transparency for people in SEQ. In addition the proposal is open to abuse by developers looking for additional avenues to subdivide rural land and grow houses rather than agricultural produce. Adhoc rural subdivisions that occur on a local basis are not consistent with having a strategic well planned approach to growth that ensures factors including water supply and onsite wastewater treatment capacity of soils, ecological, natural hazards and scenic amenity issues, public transport and rural bushfire service availability are taken into account.

- 5.2 Support rural workers accommodation in accordance with government policy in relation to rural workers, including the Rural Workers' Accommodation Initiative.

There appears to be no further detail in the Draft Update about this proposal.

OSCAR recommends that the State to release additional information so it is possible for us and other interested parties to respond to the proposal.

#### **Potential Future growth Areas (PFGAs) P 88 and Map 6 (P89) – Halls Creek and North Harbour – Broader Issues – and Northern sub-region Narrative ( P 204)**

- \* OSCAR supports the placement of these 10 potential future development sites in the RLRPA to limit development and protect them from further fragmentation that would prejudice their ability to accommodate future urban development.
- \* However, we are concerned that most of these sites, including Halls Creek, have been rolled over from SEQ2017 without any further attempt to assess their suitability for development. Their future role is to be further considered at the next SEQRP review.

- \* Halls Creek land use has major implications for the extent and integrity of the Northern Inter Urban Break and it features significant biodiversity values including endangered species and habitat for migratory birds, and contributes to the overall Ramsar wetland and other values of Pumicestone Passage. OSCAR endorses the submissions made by the Community groups across the Sunshine Coast relating to the Inter Urban break – TAPP, Cal Residents and SCEC.
- \* Stockland’s submission under the EPBC Act is a major concern, especially given the likely changes to the legislation, and the current intent in the Update to apply the new Bioregional Assessment “Traffic Light” process to the PFGAs. The issues that potentially can arise in future are significant.
- \* North Harbour PFGA at the mouth of the Caboolture River is a new PFGA. It features similar wetland and bird habitat and biodiversity values as Halls Creek, but was given EPBC Act more than a decade ago. If it is subject to a Bioregional Assessment that indicates it should be excluded from urban development, what status does that have relative to an existing EPBC Act approval, and what are the implications for Halls Creek?
- \* OSCAR questions why so many PFGAs are identified across such large areas of the SEQ RLRPA. It appears inconsistent with the main focus of the Update on increased density infill within the Consolidation UF relative to development in the Expansion areas. It implies the State will continue to accommodate whatever population growth occurs by going UP and Out! Is there a Sustainability limit to Growth?
- \* The Northern sub-region Narrative indicates that apart from the outcome of the EPBC Act submission, the suitability of Halls Creek for urban development has been under consideration, while the timing for delivery of the Beerwah East MDA is another consideration. A determination will then be made about which parts are suitable for urban purposes in future. Following an outcome of these investigations, it is intended that the NIUB will be extended to include all parts of Halls Creek that are not deemed suitable for urban purposes. While future land use remains in the balance, OSCAR welcomes the commitment about adding to the NIUB.

**Status of the Urban Footprint, the Northern Inter Urban Break, and Investigations into potential longer term urban growth opportunities (P204, 205 and 209)**

- \* OSCAR welcomes the fact that the Northern sub-region of SEQ has no extensions of the UF into the RLRPA apart from industrial land extensions at Yandina East and the Quanda Rd Coolumb estate.
- \* However, we note that part of the Yandina East industry site is subject to flooding. It is disappointing that the State is continuing to see potential urban development opportunities in flood liable sites.
- \* OSCAR welcomes the commitment to create a cadastral boundary for the NIUB and to provide further protection for its values by prohibiting or restricting incompatible land uses via the Planning Regulation.
- \* OSCAR is most concerned that, although no PFGAs other than Halls Creek are identified in the Northern sub-region, Sunshine Coast and Noosa Shire councils are encouraged to investigate the potential additional longer-term urban growth opportunities, giving consideration to broader strategies for their long-term rural, environmental and landscape sustainability. Studies are to be undertaken in consultation with the Queensland Government and other key stakeholders.

OSCAR considers this requirement to be premature and unreasonable given that the UF and Expansion areas have capacity to meet population growth and land and dwelling supply requirements to and most likely beyond 2046. The potential to accommodate future growth to 2046 within the UF Consolidation areas at greater densities remains to be fully investigated through the Housing Supply Statement process. There is potential to increase density and diversity at Aura and Beerwah East, and the life of the Beerwah East MDA is already considered to extend beyond 2046. The urban development potential of Halls Creek is to be determined by the next SEQRP Review.

OSCAR requests the State to explain the reasons for encouraging the Councils to invest time and resources in these investigations when they have so many more urgent and serious issues to deal with – housing, density, diversity, transport infrastructure and services, Climate Change, resilience,

natural hazards, Koala protection, Emergency Management capacity etc etc. In our view there is no reason why such matters cannot be held over until the next full SEQRP Review.

### **Northern sub-region Narrative**

As the Narrative is one of the major matters to be taken into account in preparing Council Planning Schemes, the content and wording is critically important.

#### **Missing Content**

- (i) There is only a single reference to the Kawana Motorway ( d) on P206) despite the fact that it has been added as the fourth region-making critical transport infrastructure project in the sub-region and the SEQIS, and is currently subject to detailed design before going through the Business case process. Combined with the recently opened Bells Creek Arterial road connection with the Bruce Highway, the existing Caloundra Link Road and the Mooloolah River Interchange upgrade project, the Motorway will ultimately provide a new north/south Motorway link between the Bruce Highway, Bellvista, Aura, Caloundra West, Birtinya Hospital and Town Centre and the Maroochydore CBD and then further north as the Sunshine Motorway. It will potentially support several industrial estates and has a link to the Sunshine Motorway heading west to Sippy Downs and USC from the Mooloolah Interchange. It will share part of the multi-modal CAMCOS corridor with the Direct Rail project, and is ultimately planned to be a 6 lane Motorway that could potentially carry public transport such as buses as well as vehicles. It will relieve pressure on eastern sections of Caloundra Rd and Nicklin Way, and has implications for the Maroochydore to Caloundra public transport project and densification along the coastal corridor.  
It's implications for the growth, land use, prosperity, connection, sustain and resilience themes are not explored in the Narrative, which begs the question – why?
- (ii) Prosper theme – Regional Economic Clusters  
There is no Narrative content for the Nambour, Noosa, Caloundra, Beerwah, Caloundra South or Sippy Downs RECs.
- (ii) Prosper – Industry  
There is no Narrative statement about other significant existing Industry sites such as Nambour, Kunda Park, Kawana, Caloundra Airport and at Noosa and their role.  
Nor about the significance of the potential recycling enterprise site at Caloundra, despite the circular economy being such an important industry and employment growth opportunity that underpins sustainability.  
There is no statement about keeping all existing industry sites available for that land use and protecting them against incompatible land uses.

## **CONNECT**

OSCAR's basic position (note our obvious emphasis on the SCRC and Noosa Shire):

Transport design must reflect local lifestyle patterns and needs of existing residents (ie respecting their amenity and reason for choosing to live in SE Queensland) as well as catering for future residents.

Planning needs to take into consideration the urgent requirement for the early delivery of transport solutions into areas identified for growth and to support existing areas where public transport and road/rail systems are already inadequate.

Increasing the housing stock in both expansion (green-field) and infill (brown-field) sites needs to be matched with appropriate regional and local transport solutions.

Infrastructure must precede population growth and not follow it – infrastructure first, higher-density development second.

We agree with the updated elements and strategies of the Connect theme that should reflect and capture:



- a. focus on planning and delivering transport infrastructure that enables housing and employment growth in the right locations
- b. updates to the strategic transport system required to support delivery against the housing supply targets and employment planning baselines through to 2046
- c. a focus on promoting active transport as a primary mode of travel
- d. key state-led infrastructure that will deliver a transport network that moves people and products efficiently across multiple modes

but it is not enough to espouse these strategies unless the resources to achieve these elements are committed by government. Too many of the transport initiatives on the Sunshine Coast remain underfunded or not funded at all – even at the business case level.

Despite this, there is an assumption that increased density (“gentle” or otherwise) can still proceed.

We believe there are insufficient transport options for projected population growth. These must include, but not be limited to:

- Zero-emission buses, a range of bus sizes fleet, high-frequency services, express services on key routes, extended hours of operation and increased route frequencies, and recognition of the need for east-west routes as well as those along the coastal corridor
- Recognition of the particular needs of people with disability and/or mobility issues
- Better connectivity from the SC to Brisbane – and therefore we support the prioritising of the Direct SC Rail Line project
- Dedicated fast-speed bikeways – recognition of the needs for both commuter and recreational cycling
- Dedicated footpaths with adequate provision of shade
- Wildlife-friendly roads – underpasses, overpasses, adequate signage for main roads
- Adequate parking provision in all residential developments (both on roads and per lot) and increased provision of free or low-cost park-and-ride facilities near transport hubs such as the Maroochydore CBD. Bureaucrats and developers cannot argue for lower parking provisions based on the need for fewer vehicles per lot based on better public transport when such public transport does not exist in many areas.

We note that the strategies to deliver Connect are stated to include:

- Moving people and freight more efficiently around the region
- Providing an extensive, convenient, safe and connected active transport network to promote walking and cycling in the region
- Developing regional activity centres with easy access to employment, education and essential services through convenient and direct transport connections
- Integrating infrastructure and land use planning to deliver a transport system that connects people, places and employment
- Investing in region-shaping infrastructure
- Establishing a movement and place framework that acknowledges streets and roads as transport corridors as well as places that are essential for everyday living.

Again, we make the point that while these are worthy elements that we support, they are meaningless without the resources needed to achieve them.

## **PROSPER**

The 2023 Update does not appear to depart significantly from the Prosper aspirations expressed in the original 2017 SEQRP.

The provision of well-located homes close to jobs is a key outcome sought from the draft ShapingSEQ 2023 Update, including acceleration of the number and type of jobs across the region. The COVID-19 pandemic highlighted the need to review the role of centres and employment land, as people continue to re-evaluate

how and where they work, influencing travel patterns and performance of employment land, including centres and industrial land.

While trade-offs between competing demands for land are inevitable, the draft ShapingSEQ 2023 Update aims to protect and enhance employment land significant to the region and its current and future needs. This is supported by proposed changes to the Planning Regulation 2017 (refer to ShapingSEQ 2023 Update Regulation Amendment Consultation Paper).

The Draft Report claims the key changes under Prosper are:

- Retains the Regional Activity Centres Network (RACN) with renewed focus on the importance of flexibility in local planning – *This aligns with aspirations of greater density in REC's like Maroochydore.*
- Strengthens the role of RECs as the locations of regionally and nationally significant economic activity – *Not clear what the change is here?*
- New regional approach to strategic industrial land – *Caloundra, Kawana and Coolum remain key in Sunshine Coast with Yandina coming into focus.*
- Strengthens planning and protection for Major Enterprise and Industrial Areas (MEIAs) across SEQ
- Identifies possible locations for strategic Recycling Enterprise Precincts (REPs) to help meet ambitious targets for recycling – *Caloundra is preferred.*
- Legislative changes, initiatives and programs to support implementation assurance
- New and focused measures for monitoring and reporting to better inform implementation and ongoing policy refinement – *Vigorous pursuit of Measures that Matter was foreshadowed in 2017 SEQRP but seems to have received limited attention.*

The draft ShapingSEQ 2023 Update has identified some localised areas of SEQ that require additional industrial land to meet the projected demand to 2046. In response, draft ShapingSEQ 2023 Update identifies future industrial land in the LGAs of Redland, Sunshine Coast and Gold Coast. (P.92)

There are ambitious targets for SEQ under the Queensland Waste Management and Resource Recovery Strategy to increase diversion of waste from landfill and increase recycling – including to achieve 85 per cent waste diversion from landfill and 70 per cent recycling rates across all waste types by 2040. Waste operations in SEQ are relatively significant in comparison to other regions. SEQ accounts for 77 per cent of Queensland's total waste, producing approximately 7,200,000 tonnes per year. Currently only 58 per cent of that waste is being recovered, with construction and demolition recovery leading the way in waste recovery, followed by commercial and industrial waste and municipal solid waste. (P 92)

The draft ShapingSEQ 2023 Update contains Queensland Treasury employment projections to 2041, noting that the final ShapingSEQ 2023 will include updated employment projections to 2046. (P.97) The 2023 Draft has the same employment projections (in Table 6) as were in the original 2017 SEQRP but updated projections to 2046 are foreshadowed.

The employment projections in the Draft Report for Sunshine Coast are:

Local government area	2010–11	2015–16	2020–21	2025–26	2030–31	2035–36	2040–41
Sunshine Coast	112,544	117,851	132,200	146,609	161,999	177,467	193,092

The ABS Census figures for 2021 give further details of the employment in the Region.

## Employment status

export  reset 

Sunshine Coast - Persons in the labour force (Usual residence)		2021			2016			Change
Employment status	↕	Number↕	%↕	South East Queensland %↕	Number↕	%↕	South East Queensland %↕	2016 to 2021↕
Employed		160,286	95.6	94.7	129,634	92.9	92.7	+30,652
Employed full-time		83,981	50.1	55.0	73,280	52.5	57.5	+10,701
Employed part-time		59,388	35.4	30.6	49,659	35.6	30.6	+9,729
Employed, away from work		16,917	10.1	9.0	6,695	4.8	4.6	+10,222
<b>a</b> Unemployed (Unemployment rate)		7,426	4.4	5.3	9,980	7.1	7.3	-2,554
Looking for full-time work		3,608	2.2	2.9	5,459	3.9	4.1	-1,851
Looking for part-time work		3,818	2.3	2.5	4,521	3.2	3.1	-703
Total labour force		167,712	100.0	100.0	139,614	100.0	100.0	+28,098

The ABS figures do not appear to align with the Draft Report projections and deserve further investigation. The ABS figures show 129,694 employed in 2016 against the Draft Report's 117,851. ABS then says there were 160,286 employed on the Sunshine Coast in 2021 against the Draft Report's 132,200. These are significant discrepancies.

## Labour force status

export  reset 

Sunshine Coast - Persons aged 15+ (Usual residence)		2021			2016			Change
Labour force status		Number	%	South East Queensland %	Number	%	South East Queensland %	2016 to 2021
Total labour force (Participation rate)		167,712	59.3	63.4	139,614	57.9	62.4	+28,098
Not in the labour force		99,655	35.2	31.3	86,557	35.9	31.2	+13,098
Labour force status not stated		15,684	5.5	5.3	14,812	6.1	6.4	+872
Total persons aged 15+		283,051	100.0	100.0	240,991	100.0	100.0	+42,060

Source: Australian Bureau of Statistics, Census of Population and Housing 2016 and 2021. Compiled and presented by .id (informed decisions).

Please refer to specific data notes for more information

It is also notable that the labour force participation rate on the Sunshine Coast is consistently lower on the Sunshine Coast. In 2016 it was 57.9% compared with South East Queensland's 62.4%. In 2021 the rate was 59.3% on the Sunshine Coast against 63.4% in South East Queensland. This may reflect the greater proportion of retirees and may mitigate against some measures aimed at increasing prosperity.

### Flexibility and responsiveness in our regional activity centres network

There are many established and emerging trends influencing how centres have and will continue to evolve across SEQ – including shifts to online retail, COVID-19 impacts on commercial office floorspace, increasing flexibility and coworking, virtual services, Native Title determinations, climate change, natural capital, and increasing knowledge intensity.



Additionally, activity centres particularly those with central locations and good connectivity might also begin to experience interest from land uses that are not the typical market for centres. As automation and smart technology result in increased knowledge intensity in sectors more traditionally associated with industrial land, there could be some high-value low impact industrial uses that might consider high quality centre environments as a potential enterprise location. This disruption and evolution demonstrates a clear opportunity to increase flexibility in existing planning controls that are historically heavily focussed on impact rather than used to create new tenant demand for some centres. In light of the rapidly changing

regional centres and their critical importance to the region's economic resilience, ongoing monitoring and review of their performance is key to understanding how best to plan for their evolution.

### Industrial land for Recycling Enterprise Precincts (REP)

The development of REPs is likely to occur through actions of local governments, industry and the Queensland Government and while the location of REPs relies on the availability of suitably zoned land, there are other factors which will determine appropriate locations and timing of future development. Port of Brisbane, Bromelton and Wellcamp are indicative sites that have been identified based on analysis of opportunities and will progress as the market takes up those opportunities. Further sites for future investigation have been identified at Caloundra, Willowbank and Stapylton.

The State has available 'Measures that Matter'. The below is for Prosper for 2021.

PROSPER	SEQ preferred future	SEQ current trend
<b>Employment by industry and occupation</b> High value-adding / export earning jobs Total jobs	 	  <p>From 2011 to 2016, there has been a slight decline (38.9% to 37.7%) in the proportion of high value-adding and export earning jobs to total jobs in the region.</p> <p>The total number of jobs increased by 18% between 2011 to 2016. This is an increase of around 225,000 jobs.</p>

It is hoped that 'Measures that Matter' will attract greater focus and more zealous updating going forward.

The Draft Plan aspires for the Region to prosper by:

- Competitive edge from 'working together';
  - Being a 'magnet' for trade, investment and sustainable growth;
  - Flowing from strong regional growth and infrastructure investment;
  - Underpinned by sustainable management of our diverse natural assets and resources; and
  - Focus on high quality design and place-making.
1. The aspiration is for our Centres to be well connected so people can choose to work throughout the region. – *Sunshine Coast's infrastructure backlog will need to be urgently addressed.*
  2. The Plan sees economic advantages in key export-oriented industries. – *Sunshine Coast will hopefully make greater use of the upgraded Sunshine Coast Airport.*
  3. Our port, airports and freight networks providing a global gateway to Asia. – *Sunshine Coast Airport.*
  4. Sunshine Coast's burgeoning Tourist Industry will play a significant role in pursuing prosperity.
  5. Rural precincts on the Sunshine Coast are expected to play an increasing role in pursuit of prosperity.

## SUSTAIN

Overall, there are no clear "Outcomes for Environment" stated. The environment is an afterthought to be managed after growth is achieved. Too much is left to LGAs to plan for and manage and should be addressed more at a regional level with regional responsibility and regional resourcing.

**Element 1. First Nations People** – *First Nations people are engaged and their culture is respected and reflected in planning for the region.*

The Northern Subregional Outcomes Reference for this Element states: *Traditional Owners will be engaged to ensure their cultural knowledge and connection is included in planning. This will be particularly relevant to Mt Coolum, Mt Ninderry and Maroochy River and Glass House Mountains (p209).*

OSCAR asks: How do we better protect First Nations Land Uses and practices?

We appreciate that inclusion in the Planning scheme is a critical element. However, we need to ensure that such protections are at the highest and most rigorous level of assessment and where, for example a developer cannot argue against such protections in the P&E Court.

OSCAR understands that, despite a recent review, the Queensland Aboriginal and Torres Strait Island Cultural Heritage Act provides very ineffective recognition, protection and conservation of these cultural heritage sites and values, and that first nations people have little confidence in the legislation. OSCAR

sincerely hopes that the commitments in the SEQRP Update to engagement with First Nations people will include discussions of cultural heritage legislation that reflects their needs and aspirations.

**Element 2. Biodiversity** – *The Regional Biodiversity network is protected and enhanced to support the natural environment and contribute to a sustainable Region.*

The Strategies in the Draft SEQ document include terms such as *maintain and enhance value and connectivity corridors; avoid fragmentation of corridors, protect, restore, rehabilitate and manage regional biodiversity values; rehabilitate and support them from inappropriate development.* (P 143 points 2.1-2.3) *Reference is made to offset delivery* (p 143 point 2.4).

In the Northern Sub-Regional outcomes reference (p207), the language used is very general and does not include specific reference to a number of threatened species, e.g. turtles and their nesting areas and the Wallum Sedge Frog and its environment.

There is also no reference to urban biodiversity, which on the Sunshine Coast coastal area includes both vegetation (including endangered vegetation) and associated birds and animals. This is particularly relevant when considering increasing density even via “gentle density” in currently low density residential areas.

Any planning must give due regard to wildlife habitats, the need for linking corridors and provision of species friendly infrastructure such as aerial crossings above roads and underpasses for animals.

OSCAR supports points 2.1-2.3, (p143) however is very concerned about what and how the mechanisms will be implemented to undertake such actions. The language is very general and we would like to see more specific and supportable actions and not have such left to Local Government to determine.

We also are very concerned re the suggestion that offsets may be considered. Offsets in Australia have a poor record. OSCAR recommends that any offsets must be like for like and in the same location.

Reference is made to the UNESCO Biosphere declarations. Just because much of the coastal region is included in the “live” mapped area, does not mean that it is okay to not give the same consideration to those areas as other biodiverse areas.

Key principles should be mandated to protect threatened species e.g. Koalas (as per the Koala Conservation Strategy), Wallum Sedge frogs, nesting turtles and Kangaroos to name but a few.

Actions such as:

- The need to retain “Dark Skies” should be clearly mandated in specific/scientifically identified areas for example, dark sky area over Pumicestone Passage as part of inter-urban break
- Artificial Light – planning needs to properly address light management in coastal areas for marine turtle nesting
- Actions to protect, maintain and or increase the elements of urban biodiversity that exists in areas subject to increasing densification.

### **Element 3. Koala Conservation**

OSCAR endorses the Biodiversity and Koala submission made by QCC.

**Element 4. Regional Landscapes** – *Regional Landscape values and functions are sustainably managed and provide social, environmental, cultural and economic benefits to the region.* (P144).

Strategy 4.1 references inter-urban breaks, 4.2 protecting scenic amenity areas from development that would compromise their value and 4.3 references protection and enhancement of regional greenspace.

OSCAR is supportive of these outcomes and particularly the maintenance of the full inter-urban break that includes Halls Creek within the inter-urban break.

Definitionally the Northern subregion includes the whole of the Sunshine Coast and Noosa LGAs. Given the wider definition, our community members are very concerned that Green space, and including in urban areas is not adequately considered, including:

- natural habitat for urban biodiversity
- open green space for people
- dedicated exercise areas for dogs away from wildlife habitat

#### **Element 5. Water sensitive communities**

OSCAR supports Strategies 5.1 and 5.2, but would like to see the inclusion of the words “including for future generations” at the end of Strategy 5.1 and following the words “meets the needs of the environment, industry and community, including for future generations.

Element 5.2(p144) references “increasing the efficient use if water”. In order to ensure that communities are water sensitive and that water is not wasted it is imperative that the Water utilities ensure that their water assets are fit for purpose and the level of maintenance and/or renewal is addressed prior to any densification and population increase in both low, medium and high density residential areas.

#### **Element 6. Natural Economic resources**

OSCAR supports Elements 6.1-6.5 generally. However, we make specific reference to Element 6.1. *Conserve agricultural areas, including those which provide communities with an affordable supply of fresh food, food security and export earning potential (P144), (Map 18, Table 16 (P161).*

It is critical to protect those areas considered productive in 50, 100 & 150 years as critical hot spots as well as future agriculture that moves from areas that can no longer be supported after climate change.

Given the above statement and that we do not know what advances will be made in terms of agricultural production and technology, to attempt to identify current supposedly “unprofitable” agricultural areas for potential urban development is short sighted at least and irresponsible at most.

There should be no reduction of available agricultural land until the gentle density development, accelerated release of locked sites, changes to Short Term (ST) stays and vacant dwellings has been shown to have failed.

#### **Element 7. Climate Change**

Greater acknowledgement of Climate Change needs to be incorporated into the plan with links to such work completed or underway e.g. the various CHASs with community consultation, government flood planning, CSIRO severe weather analysis, etc. As mentioned above climatic events will become more regular and severe and care need to be taken not to put future communities in danger of floods, fires etc

The dimension of climate change needs to be adequately addressed across the board, allowing for both adaptation to impacts and mitigation of GHG emissions, including:

- Efficient building design – passive heating and cooling, electrification
- Allowance for retreat of saltmarsh and mangrove habitat as sea level rises
- Protection of floodplains for flood storage
- Low/zero emission transport options.

One of the key changes under SUSTAIN is: *Retains and enhances strategies to meet emission reduction targets set out in the Queensland Climate Action Plan (p21).*

From the web site -

We will deliver:

- 50% renewable energy target by 2030
- 30% emissions reduction below 2005 levels by 2030
- 70% renewable energy by 2032
- 80% renewable energy by 2035
- zero net emissions by 2050.

*OSCAR Comment - interim targets through the SEQRP planning period is only 30% emissions reduction below 2005 levels by 2030 the others are all for the energy sector. So how does this help a progressing of housing energy reduction targets to meet climate change targets – which are not spelt out?*

Page 48, United Nations SDG 13 Climate change: taking urgent action to combat climate change and its impacts.

This is a good goal – yet forward planning for example on the Sunshine Coast is “informed” by outdated CHAS where there has been no update from last 2 IPCC sea level rise updates, even though the CHAS has this trigger.

This also relates to the claim that the SEQRP is to be evidence based. State and LGs need to ensure that their CHAS are updated based on IPCC reports.

**Elements 7.1 – 7.5** are good strategies but as always they need appropriate targets eg intermediate emissions reduction targets; renewable energy development to support electrification including EV uptake, population and industrial growth.

**Element 7.6** *Queensland Government to lead by example in minimising emissions in line with the Paris Agreement and offsetting more than 100 per cent of any remaining emissions, including low carbon, circular and sustainable procurement.*

Question: Why is this here? This should be an information box or example, not a regional development strategy.

**Element 7.7** *Investigate adopting a preferred Representative Concentration Pathway (RCP) or Shared Socioeconomic Pathway (SSP) to guide consistent identification of risk and climate mitigation, disaster risk reduction, and adaptation efforts in settlement planning and built form/urban design.*

This strategy should have been completed already. This policy guidance decision can be determined largely from the State’s emission targets. The adopted RCP must form the basis of any forward infrastructure planning. It is not a strategy but a critical starting point. Critically, LGA CHAS/CHAP programmes cannot be updated.

The IPCC recommends planning for 150 years now for critical infrastructure – which is this SEQ plan?

Reviews of CHAS will be triggered when this is completed which should flow through into planning schemes.

Why hasn’t this been done? Need to know what confidence level i.e 17% or 5% chance of exceedance.

## **Element 8. Resilience**

**Element 8.2** *Identify “No go” future development areas in accordance with the avoidance principles of the SPPs. No go zones* – should be established and managed in the following landscape features:

- Floodplains
- Land-slip and erosion prone areas
- Groundwater recharge areas
- Shorebird roosts and feeding

This should include Riverine Flood Plains especially the Maroochy River floodplain and other Riverine Flood plains, where it is totally inappropriate for development to occur. Further residential development in these areas would take away from agricultural land future potential and opportunities and would put future communities in danger during flood events. This is especially so for the financially challenged members of the community unable to afford or secure flood insurance. The concept of a one in a 100 year event will over the life of the SEQRP be totally recalibrated.

**Element 8.3** Identify existing urban areas subject to intolerable risk for further investigation for feasible mitigation alternatives with a view to support transition of existing uses over time.

This strategic planning will be required to ensure that mitigation is not deferred solely to on-site/built form approaches - particularly where infill in hazard areas may present off site cumulative impacts or disaster management/evacuation challenges.

**Element 8.6** *Incorporate heatwave and urban heat considerations in SEQ settlement planning and urban design, including increasing tree canopy coverage within centres and residential areas to achieve a minimum of 15 per cent in the Capital city centre, 25 per cent in urban residential and light commercial and 50 per cent in suburban residential areas.*

This strategy should also incorporate design criteria for urban green corridors for wildlife and micro-mobility.

Preparing for future adaptation – cannot be feasibly mitigated through settlement scale solutions like levees, sea walls. This action is realistic but requires early identification of problematic areas and a moratorium of worsening the situation by placing more people there before the overall strategy is in place.

Map 15 Sustain – Regional biodiversity network

Local connections are also very important that can also serve to increase tree canopy and provide micro-mobility space. These local networks can link the dwindling remnant and disturbed but important refuge areas to each other and where possible to the major corridors.

## **LIVE**

OSCAR supports all 9 Elements and associated strategies of the LIVE Vision Elements. They are ambitious and it is important that the community is active, engaged, respected and their contribution valued. Any such engagement must be transparent and include regular feedback to the participants and the wider community.

## **Issues for Northshore and Noosa**

### **General Comments**

The SEQRP is a planning instrument to assist the Queensland State Government and seven local authorities plan future infrastructure and manage growth. The refresh is particularly focused on meeting the needs of housing demand now and into the future.

It has the ability to draw several strategic plans and planning tools together to set a vision for the region and to bring benefit to existing residents, future generations and industry by creating key principles to underpin future investment decisions by individuals, the private sector and the public sector (across its three tiers of government and its various instrumentalities.)

By refreshing the plan, with supporting documents, a new vision with the buy in from all stakeholders can be achieved. Such a refreshed Vision needs to take into account projected growth increases (as a result of COVID), current and ongoing research regarding impacts of climate change and the changing social needs of communities under stress from housing costs, lack of public transport and failing infrastructure.

The SEQRP should give support to the whole of state planning however the SEQRP does not need to find “solutions” for all of the state’s issues. Consideration could be given to a more proactive approach to encouraging growth in regional centres outside the South-East in what is already Australia’s most decentralised state.

### **Specific Issues**

#### **Gentle Density**

There needs to be clarity in the document to ensure over development, loss of amenity, and local environmental degradation does not occur. If gentle density is totally code assessable then “side by side” development approval will clearly have a detrimental effect on local neighbourhoods and landscapes. The SEQRP could consider setting targets/limits on allowable density in certain areas. The rate of “gentleness” needs to be understood by the community, the approving authority and respective developer. There is a real



risk of cluttered developments aggregated together forming future social challenges. Experience overseas and in Australia with tenement housing has led to social alienation and disharmony.

### **Stakeholder Inclusion**

The document lists several stakeholders but does not sufficiently identify resident groups like OSCAR as stakeholders. At the end of the day planning should be about people, and about where they live, work and play. Community input and recognition of the community's values and vision for themselves collectively on a regional, local, and neighbourhood basis is critical. The drive for increasing the housing stock is important but it should not come at the loss of local amenity and liveability.

### **Transport**

Planning needs to take into consideration the urgent requirement for the early delivery of transport solutions into areas identified for growth and to support existing areas where public transport and road/rail systems are already inadequate. Increasing the housing stock in both green-field and brown-field sites needs to be matched with appropriate regional and local transport solutions.

### **Urban infill**

Care needs to be given by approving authorities when allowing or encouraging infill developments. Negative impacts such as cluttered on-street parking has occurred in the past which only adversely affects things like services. Master-planned estates can at the stage of design and development take into consideration all aspects of liveability however progressive infill in an uncontrolled fashion can cause significant impacts on access to green space, loss of local ecosystems and amenity.

### **Vision**

Having a vision without regulation or assessment regimes can lead to poor quality decision making and loss of confidence in state and regional authorities. There needs to be open and transparent processes for decision making, suitable guidelines or regulation and in some circumstances community education to allow the vision to be understood, supported and owned by all.

### **Wildlife Corridors and Breeding Sites**

Any planning must take due regard to wildlife habitats, the need for linking corridors and provision of species friendly infrastructure like aerial crossings above roads for animals.

Key principles should be mandated to protect threatened species e.g. Kolas, Kangaroo and nesting turtles to name but a few. Such things as need to retain "Dark Skies" should be clearly mandated in specific/scientifically identified areas.

### **Sweating of Assets**

Maximising infrastructure lifecycle timeframes is supported however undue sweating of assets could lead to over use and or lack of reinvestment into future infrastructure. The hording of underperforming assets past their respective use by dates whether they are road systems, water grids or power lines will lead to significant issues around servicing the needs of existing and prospective users. The costing of new communities should also take into consideration the provision of essential infrastructure. Getting "ahead of the curve" is difficult but must be the aim rather than what is often seen as catch up infrastructure provision. This includes transport systems, hospitals, schools etc.

### **Review and sunset mechanisms**

There is a need to set specific review dates on the SEQRP and its various initiatives and frameworks to ensure it is meeting the desired outcome for ALL not just specific elements of the system.

## CONCLUSION

Thank you for the opportunity to comment on the Draft SEQRP Update.

As you can see OSCAR has prepared a substantial submission reflecting community viewpoints from across the Sunshine Coast and Noosa Council areas on a wide range of regional and local planning issues arising from the Draft Update.

Although the Update is not a Review of Shaping SEQ, it is initiating a transformational paradigm shift in population growth management, preferred settlement pattern, urban form and the built environment. We hope that you will appreciate that much more work needs to be done to finalise many aspects of these new regional planning arrangements so that they have the best possible chance of achieving the laudable visionary outcomes sought for the region.

OSCAR encourages the State to consider the many recommendations and perspectives in our submission, and engage collaboratively with community groups such as ours and Local Governments in finalising the new arrangements.

OSCAR would welcome the opportunity to be part of such a collaborative process as the peak umbrella community organisation in the Northern sub-region of SEQ.

This submission is made by the Organisation Sunshine Coast Association of Residents Inc. (OSCAR) and submitted by the President- Melva Hobson PSM.

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