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Recognising and upholding excellence in local government

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) The Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit peak body/umbrella group representing resident and community organisations across the Sunshine Coast and Noosa Local Government Areas in South East Queensland.

OSCAR currently comprises 36 member groups spanning from Pumicestone Passage to Noosa and from the Coast to the Hinterland and Ranges. Collectively, these organisations represent several thousand engaged, community-minded residents who are deeply committed to protecting the Environmental, Cultural and Social Values of our region. OSCAR's overarching Vision states:

"The residents of this region enjoy being part of a connected and engaged community living in an area of outstanding natural beauty. They recognise that they are custodians of the unique and abundant biodiversity, beaches and green spaces of the region."

Introduction

OSCAR thanks the Department of Planning for the opportunity to respond to questions contributing to the current review of the Southeast Queensland Regional Plan. The Regional Plan is one of the most critical planning documents to the residents of the State. Listening to the community is a major role of the State Government in this exercise.

Question 1

What housing, employment and infrastructure policies or themes in the current SEQ Regional Plan (SEQRP) 2023 do you support continuing in a new SEQ regional plan?

Overall, OSCAR supports the approach taken in the 2023 SEQRP. The document was well presented, with a clear direction and able to be understood. The selection of the Themes of Grow, Prosper, Connect, Sustain and Live, gave a clear indication of the purpose, coverage and direction of the plan. Although a lengthy and complex document it was written in a way that could be broken into manageable sections for consideration.

In this response we have endeavoured to reference specific areas of SEQRP 2023.

Positive aspects of SEQRP

- Growth to be supported by "right infrastructure" (page 19)
- Every Queenslanders should have access to a safe, secure, affordable home that meets their needs (page 20)
- SDG 13 Climate change: taking urgent action to combat climate change and its impacts. (page 25)
- 50 year vision Residents of SEQ, including our children and grandchildren, will enjoy a wide range of choices in their lifestyles, housing and jobs, and how they get around. This will

make SEQ a leading model of subtropical, climate resilient living where choice allows everyone to lead productive and fulfilling lives. (page 26)

- 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. This form of development already exists in a number of locations across SEQ, Queensland, and Australia. (page 42)
- A review of design requirements for medium density development and identifying critical design elements that improves amenity and encourages good quality design (page 43)
- Moving people and goods efficiently and sustainably by optimizing routes and utilizing cleaner technologies, such as electric or hybrid vehicles and trains, the region can significantly decrease its carbon footprint. (page 65)

Element 6 Natural economic resources

- 6.1 Conserve agricultural areas, including those which provide communities with an affordable supply of fresh food, food security and export earning potential (Map 18, Table 16).
- 6.4 Protect, enhance and sustainably manage waterways and fish habitats to sustain fish stock levels and maximize fisheries production for the ongoing benefit of the environment and community. (page 73)
- 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. (page 73)
- 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. (page 73)
- 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. (page 73)
- Bio-regional planning Climate adaptation zones and refugia Benefits: Enhanced resilience and capacity to adapt to climate change impacts. (page 78)
- Preparing for future adaptation cannot be feasibly mitigated through settlement scale solutions like levees, sea walls, or bushfire mitigation (page 83)
- **Resilience**-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 offsite cumulative impacts or disaster management/evacuation challenges. (page 83)
- **Live** Element 2 Working with the weather 2.1 Ensure all design outcomes are adaptive and responsive to SEQ's climate, applying a subtropical design approach. (page 85)
- **Urban Footprint principles** 6g - exclude areas with an unacceptable risk from natural hazards, including predicted climate change Impacts (page 91)
- **Resilience** The intent to deliver risk-responsive growth across the region means that this sub-region will become an exemplar of safer places and resilient built-form. This will be achieved by building on the lessons learned from previous events since 2011 by ensuring that natural hazard and climate risk assessments and settlement-scale mitigation planning inform future expansion and consolidation growth efforts. (page 99)

- **Resilience:** preparing for future settlement adaptation – by integrating outcomes from local natural hazard risk management and adaptation strategies like local governments Coastal Hazard Adaptation Strategies. (page 104)

Critical qualifications of this support are:

- Linkage between what are essentially aspirational goals and strategies are often weak or missing
- There is an underlying impression that good planning is being deferred and will come after accelerated development

Question 2

What housing, employment and infrastructure policies or themes in the current SEQ Regional Plan 2023 should be changed or have gaps that should be addressed in the upcoming review?

Legend – ° below indicates OSCAR’s comments

50-year vision

- Quality of life criteria from 50 year vision (page 26) do not appear to be followed through the remainder of the planning document.

Sustain

- Promoting ecological sustainability and resilience In 50 years, we will value and protect our greatest assets – our natural systems – which are fundamental to SEQ’s unique character, heritage, and liveability. These systems sustain urban and rural communities, and provide agricultural, tourism and recreation opportunities. (page 30)
 - The view that the community will value and protect natural systems in 50 years cannot be supported. This goal is inconsistent with environmental protection and sustainability legal requirements, and the biosphere designations. These values are to be protected NOW and form a basis for balanced development NOW.
- SEQ’s catchments will be the best managed in the world, resilient to climatic events and able to minimize economic and social costs to the Community (page 30)
 - Although an admirable goal, it simply gives the impression of being written by a marketing team as it is not embedded through the SEQRP. With such a goal, risks to water quality and aquatic systems should be identified as a priority throughout the SEQRP.
 - The cost to the community of being a world leader in this field does not appear to be referenced. Is the State Government prepared to pay the required costs?

Grow

- Local governments are required to meet the dwelling diversity targets set by the ShapingSEQ 2023 Update. This includes actively progressing policy and servicing activities, such as: a review of the category of assessment for gentle density housing products to provide planning certainty for industry in delivering gentle density housing products (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) (page 42)

- This objective is reasonable if other precursors have been completed such as risk assessments, future climate targets established, infrastructure needs in place. The SEQRP does not specify these precursors here.
- A review of 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 (page 42)
 - This action appears inconsistent with lived experience. There are numerous areas with street parking problems currently on the Sunshine Coast and this issue consistently is raised in surveys as of concern.
 - The action seems negative where existing street parking is at a premium, ancillary vehicles such as boats and caravans occupy near permanent street parking positions, and without due regard to adequate nearby and timely public transport that travels to appropriate destinations being available.
- The Queensland Government is committed to expedited processes that unlock housing supply in accordance with the ShapingSEQ 2023 Update, available through alternative streamlined plan making processes (i.e. Minister's Guidelines and Rules) or the development assessment framework to support short term Need. (page 42)
 - This action appears in conflict with the rest of the SEQRP addressing sound planning principles. Accelerated provision of resources to assess impact assessable developments should be prioritised over truncated reviews for green-field development. Infill development and gentle density would appear more suitable for expedited processes.
 - Fast tracking of conforming developments or prioritising review of developments approaching conformity increases approval rates and sends a positive signal to the market.
 - Close enough is good enough is unacceptable for code assessable development. We understand there are examples of approval of non-conforming developments by private assessors. This behaviour under-mines confidence in the planning process and allows a progressive decline in developments delivering the goals of the SEQRP.

Goals, elements and strategies

- 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. (page 73)
 - This action underpins sound planning for a future climate and most notably sea level rise critical for coastal communities. This action is of critical importance and in fact should already be in place.
 - The CHAS for the Sunshine Coast has triggers for a review including updates by the IPCC and government. Two updates to sea level projections have been issued by the IPCC without triggering an update of the CHAS as indicated by the document date. The Federal government released a planning benchmark in 2025 for sea level rise which again does not appear to have triggered a review of this critical planning document.
 - Accelerated housing development in green-field areas before this action is complete conflicts with much of the forward planning actions elsewhere in the SEQRP
- Circular economy (page 84)
 - This theme appears to be an afterthought in the SEQRP.

- Element 6 Natural economic resources 6.1 Conserve agricultural areas, including those which provide communities with an affordable supply of fresh food, food security and export earning potential (Map 18, Table 16).
 - This statement appears contradicted elsewhere where development on such land appears welcomed. Good quality agricultural land is both a finite resource and generally compatible with risks to development such as flooding and bushfires. It also contributes to green space and can support natural assets close to built-up areas. Housing on the other hand can be developed on a wide range of land quality other than good quality agricultural land where other risks are tolerable.

Question 3

Are there any other comments around housing, employment and infrastructure you would like to make?

1. 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 lived experience. The community wants to see better planning decisions re location, siting, distances from the beach, tapered density, protection of biodiversity, effective public transport availability, 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.

2. 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.

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.

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. In relation to Supply, 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, transport infrastructure

and services planning, as well as 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.

3. 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. 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.

The financial benefit to Local councils of lower cost development and services cannot be overstated.

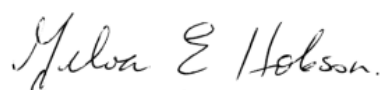
4. OSCAR recommends that the Queensland Government would be well advised to see what learnings can come from the Sydney, Melbourne, Auckland and various other overseas planning reforms to date. i.e. by investigating what problems were being addressed, by what means, and with what outcomes. What has worked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

5. 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.

Conclusion

OSCAR and its member groups (some of whom have made their own submissions) thank the Government for the opportunity to input into this process.

Yours sincerely



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