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Recognising and upholding excellence in local government

ORGANISATION SUNSHINE COAST ASSOCIATION OF RESIDENTS INC. (OSCAR)

Submission on the Halls Creek Priority Development Area (PDA)

28 October 2026

Minister for Economic Development Queensland Government.

Email: contact@edq.qld.gov.auc

Dear Minister,

RE: HALL CREEK PRIORITY DEVELOPMENT AREA (PDA)

The Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit peak group representing resident and community organisations across the Sunshine Coast and Noosa local government areas. Comprising 36 member groups spanning the region from Pumicestone Passage to Noosa and from the coast to the hinterland and ranges, OSCAR represents several thousand engaged 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."

INTRODCTION

OSCAR welcomes the opportunity to comment on the Proposed Development Plan. Our comments do not cover the whole Development Plan but some key areas of interest to our members. These include: the loss of the Regional Interurban Break; environmental matters relating to the Wallum Sedge frog offset arrangements and potential associated issues; consideration of issues relating to housing typologies and the provision of social and affordable housing.

OSCAR is also committed to the Purpose of the Planning Act 2016 and how that is achieved in this application.

Purpose of Act

(1)*The purpose of this Act is to establish an efficient, effective, transparent, integrated, coordinated, and accountable system of land use planning (**planning**), development assessment and related matters that facilitates the achievement of ecological sustainability.*

*(2)**Ecological sustainability** is a balance that integrates—*
(a)the protection of ecological processes and natural systems at local, regional, State, and wider levels; and

(b)economic development; and

(c)the maintenance of the cultural, economic, physical and social wellbeing of people and communities.

(3)For subsection (2)—
(a)protecting ecological processes and natural systems includes—
(i)conserving, enhancing or restoring the life-supporting capacities of air, ecosystems, soil and water for present and future generations; and

(ii)protecting biological diversity; and

(b)achieving economic development includes achieving diverse, efficient, resilient and strong economies, including local, regional and State economies, that allow communities to meet their needs but do not compromise the ability of future generations to meet their needs; and

(c)maintaining the cultural, economic, physical and social wellbeing of people and communities includes—
(i)creating and maintaining well-serviced, healthy, prosperous, liveable and resilient communities with affordable, efficient, safe and sustainable development; and

(ii)conserving or enhancing places of special aesthetic, architectural, cultural, historic, scientific, social or spiritual significance; and

(iii)providing for integrated networks of pleasant and safe public areas for aesthetic enjoyment and cultural, recreational or social interaction; and

(iv)accounting for potential adverse impacts of development on climate change, and seeking to address the impacts through sustainable development (sustainable settlement patterns or sustainable urban design, for example).

THE CONTEXT

Over recent years, OSCAR has supported the initiative of both Sunshine Coast Regional Council and the Moreton Bay City Council in their joint concept and support of a Regional Inter Urban Break between the two adjoining Local Government Areas.

The argument and need for such an initiative has not decreased but one could say that with increasing movement between Brisbane and areas of the Sunshine Coast and Noosa for both permanent living and short accommodation has significantly increased such a need. It is not good planning to have a continuous stretch of intense urban development from Noosa to the Queensland/NSW Border along the coast and the Bruce Highway with a distance of some 250 KM. Having the existing interurban break gives a drivers a sense of arrival, freshness and anticipation when heading north to the Sunshine Coast and Noosa. It also good for community health and wellbeing.

The gradual attrition of the Regional IUB started with the declaration of the Halls Creek precinct being declared a PFGA Potential Future Growth Area under the existing South East Queensland Regional Plan (SEQRP) and in July of 2026, a further declaration as a Priority Development Area (PDA).

Given the above and the focus of the current State Government on housing, one might say ''at any cost''. OSCAR appreciates and shares the housing concerns of the Government and the Community but we want to see space being left or created, particularly in relation to environmental amenity.

COMMENTS ON ELEMENTS OF THE CURRENT PROPOSAL

1. Housing and population.

OSCAR acknowledges that the proposal considers a greater range and typology of housing than what is often seen in greenfield sites. OSCAR appreciates the response by Stockland to questions relating to a range of housing and its plans for both active and public transport design and purpose as follows:

Housing and population

Aura South will deliver a diverse mix of up to 12,000 new homes to address critical demand and the Sunshine Coast region's ongoing housing challenge. The project intends to provide a range of housing typologies designed to meet the needs of different household types and life stages.

Urban design outcomes will seek to balance housing choice, liveability, and environmental outcomes. Final population, dwelling yield and density outcomes will be determined through the approved planning framework, detailed precinct planning and infrastructure servicing.

Aura South's approach to affordable and social housing aligns with the Queensland Government's Shaping SEQ targets. Aura has demonstrated how a strong focus on affordability can drive innovation in housing design and broaden opportunities for first home buyers, young families, and key workers. Aura South will build on this approach, with a continued focus on innovative housing solutions that support affordability and choice.

Active and public transport provisions

Active transport is a key consideration in the planning and design of Aura South, with a comprehensive network of walking and cycling connections integrated through streets, open spaces and key community destinations. Connections will also link into neighbouring Aura's broader active transport network.

Aura South will:

- *Encourage the use of public transport to reduce reliance on private vehicles.*
- *Provide efficient travel options to help people spend less time commuting.*
- *Highlight the long-term benefits of using public and active transport modes.*
- *Support environmentally friendly transport choices to benefit the wider community.*

Opportunities to support active transport and reduce reliance on private vehicles have been thoroughly considered and incorporated into Aura South's design. Active and public transport provisions will improve local and regional connectivity and support active lifestyles, with key features such as a veloway and 2km of active cycle tracks, priority bus infrastructure, and walking trails. Further, Aura South is strategically located adjacent to the existing Aura community, with easy access to committed transport infrastructure such as The Wave heavy rail.

Aura South is intended as a self-contained community where residents can meet most everyday needs close to home. It incorporates best practice community design and is based on the following principles:

20min City Principle – 2km, 20-minute walk from edge to centre of the site, supporting self-containment and maximising walkability.

10min Neighbourhood Principle – community is structured around interconnected, walkable-scale neighbourhoods that support localised housing diversity and facilitate active and public transport movement networks.

*The landscape design will also focus on increasing canopy cover to mitigate urban heat impacts, making it more desirable and comfortable to use the pathways, cycle ways and public transport modes. (*Mark Stevens Manager Stockland on 28 October).

OSCAR Requests that an ongoing conversation is established between Stockland, OSCAR, Take Action Pumicestone Passage (TAPP) Caloundra Residents Association (CRA) and other interested community groups as this project is implemented. Stockland have been amenable to such conversations with the development of Aura.

2. Wallum sedge frog protection

OSCAR makes the following comments in relation to this issue, one about which we have commented in previous consultation processes.

The proposed development site at Halls Creek has a confirmed population of Drymomantis olongburensis (wallum sedge frog) listed as vulnerable under the EPBC Act. To compensate for potential residual significant impacts associated with wallum sedge frog habitat loss, a Wallum Sedge Frog Offset Strategy is proposed including a dedicated offset area (Figure 1) including the conservation and restoration of a small area of existing breeding habitat already present within the offset area, the creation of six times this area of breeding habitat and conservation, and restoration of over 50 times this area of forage and dispersal habitat.

The site is adjacent to the waters of the Pumicestone Passage and in part immediately adjacent to the current tidal zone as depicted by the highest astronomical tide (HAT) as mapped by the Sunshine Coast Council (SCC) (Figure 2).

Sea level rise is recognised as a threat to be countered by applying the requirement of considering sea level rise of 0.8m by 2100 by the Queensland government. This criteria forms part of the requirement nominated within the State Planning Policy 2017.

At a sea level rise of 0.8m, SCC mapping indicates the tide zone will intersect significant areas of created breeding habitat (Figure 3). To counter this, the Wallum Sedge Frog Offset Strategy proposes localised bunding of protected frog breeding habitat. OSCAR remains unconvinced that bunding of a freshwater wetland environment that would be below the upper tide height is a permanent solution. Further, additional inundation during a storm tide event (at least 0.7m higher again at high tide) will occur resulting in an onerous ongoing management requirement to quickly restore ecological function to the freshwater wetland if the bund fails. This action is an ongoing and possibly onerous cost to the authority managing these sites at this time.

The 0.8m sea level rise criteria referred to by the developer is only a portion of the relevant definition in the State Planning Policy 2017. The remainder states that “Sea level rise projections based on the best available science are prepared by the Intergovernmental Panel on Climate Change”. IPCC projections have been amended since 2013 and now acknowledge that it is highly likely that sea level rise will continue after 2100 and that projections of their latest Sixth Assessment Report are likely to underestimate sea level rise. In part to offer a precautionary approach to planning for “significant infrastructure”, the IPCC recommend planning for a sea level rise at 2150. To provide an example, Figure 4 depicts the sea level rise

associated with the projected sea level at 2150 of 0.6m[1]. A large area of the created breeding and dispersal habitat would be lost.

The approach reported in the Wallum Sedge Frog Offset Strategy is a minimum legal response and is not based on a fit for purpose risk assessment. Given that impacts are expected by 2100 and will grow worse thereafter, OSCAR does not believe the strategy meets the standard required for an offset area, that is, to provide permanent protection of biodiversity values and additional management actions to improve biodiversity and broader environmental values over the longer term.

3. Runoff to Pumicestone Passage

The developer has indicated that Aura South is not expected to have negative residual impacts on water quantity or quality within the Site or downstream in Pumicestone Passage. This finding is reassuring in part only. It must be noted that the water-sensitive urban design criteria are NOT comparable to the objectives of EPP Water. At another development site proposed in recent years, managed by the same developer and within the same local government area, application documents in fact claimed that EPP Water objectives were met because water-sensitive urban design criteria were achieved. As a result, water management planning and discharge criteria failed to meet EPP Water objectives.

To avoid this unfortunate situation repeating, OSCAR requests that a clear commitment is required to meet water quality objectives of the Environmental Protection (Water) Policy into the future.

1 Current emission trajectories and Nationally Determined Contributions submitted to the UNFCCC indicate a warming midway between SSP2-4.5 and SSP3-7.0 emission scenarios. The IPCC Sixth Assessment Report includes projections into the future including 2150. To account for the likely significant but not quantified contribution from Antarctica, the IPCC that significant developments plan for sea level rise to 2150. The upper likely (1 in 6 chance of being exceeded) additional sea level rise for this current emission trajectory is 0.6m.

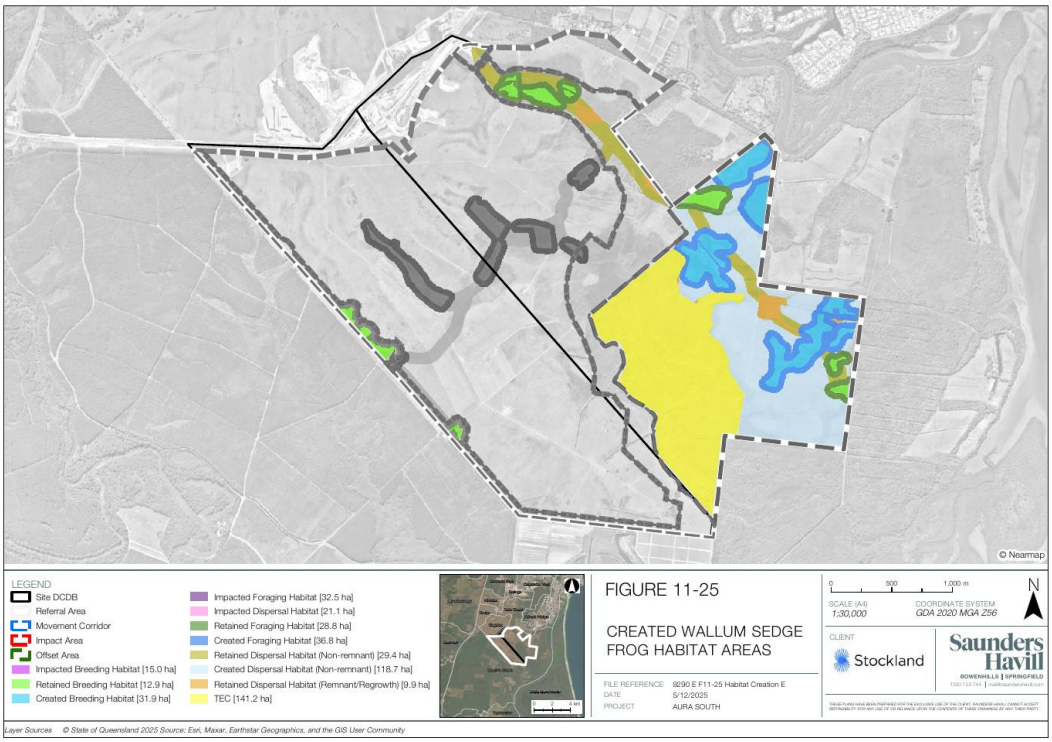


Figure 11-25: Created WSF Habitat

Figure 1: Location of the wallum sedge frog offset area that comprises created breeding and dispersal habitat to the east.

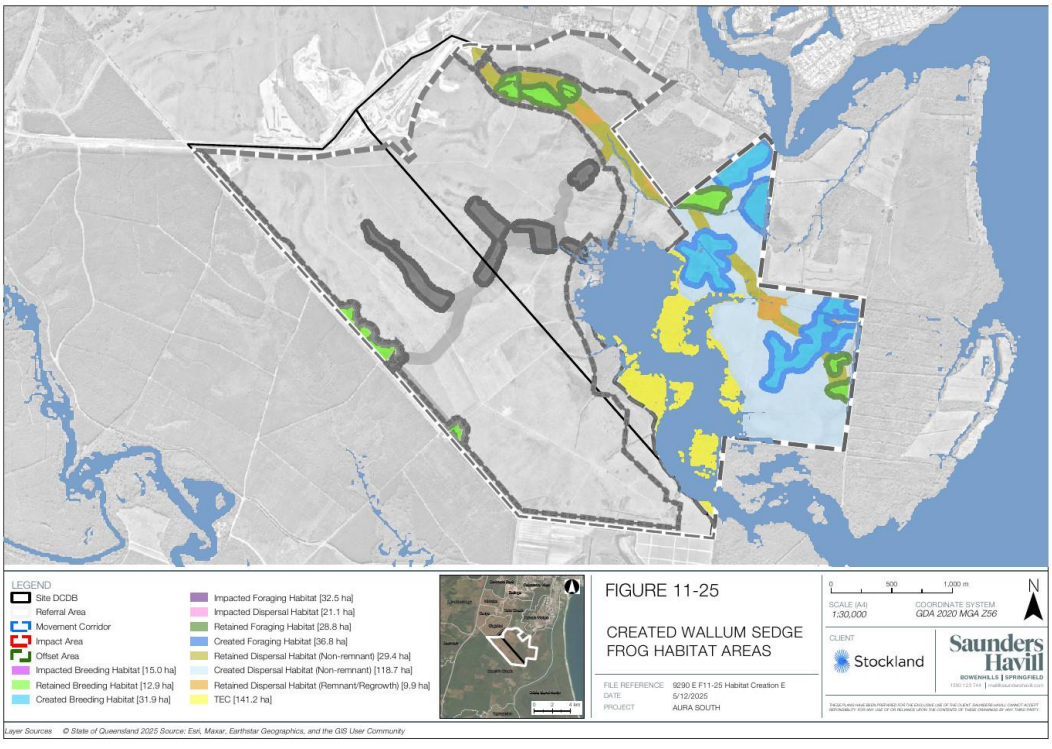


Figure 11-25: Created WSF Habitat

Figure 2: Current upper tide level (HAT) as mapped by Sunshine Coast Council

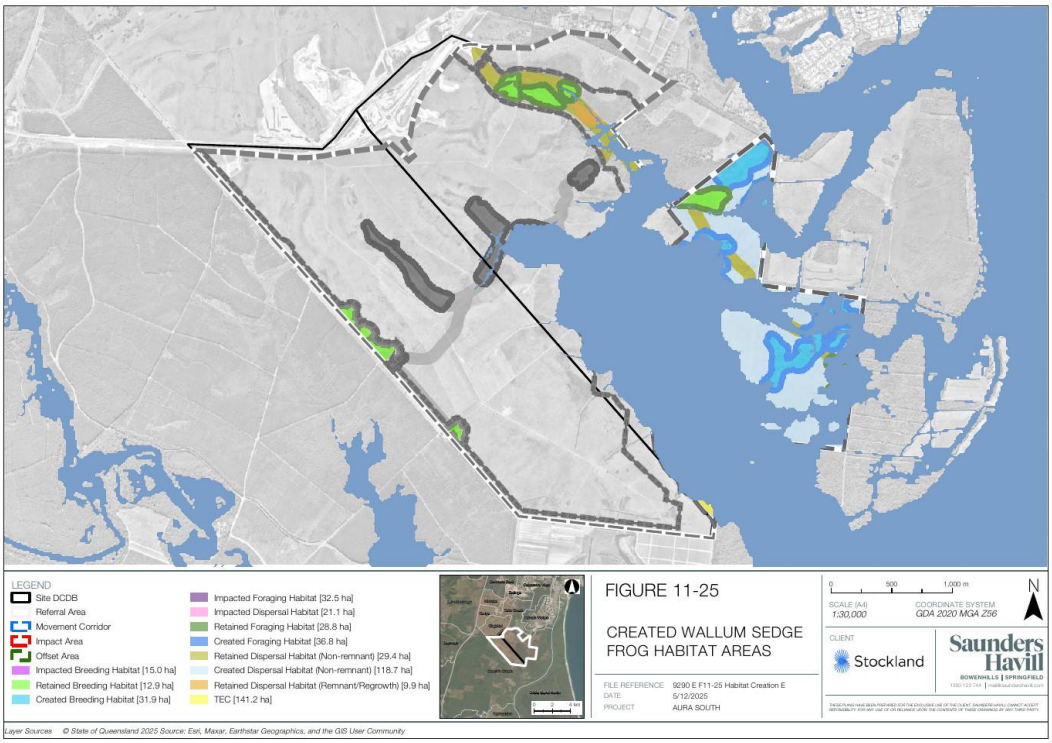


Figure 11-25: Created WSF Habitat

Figure 3: The HAT expected in response to a sea level rise of 0.8m as mapped by Sunshine Coast Council

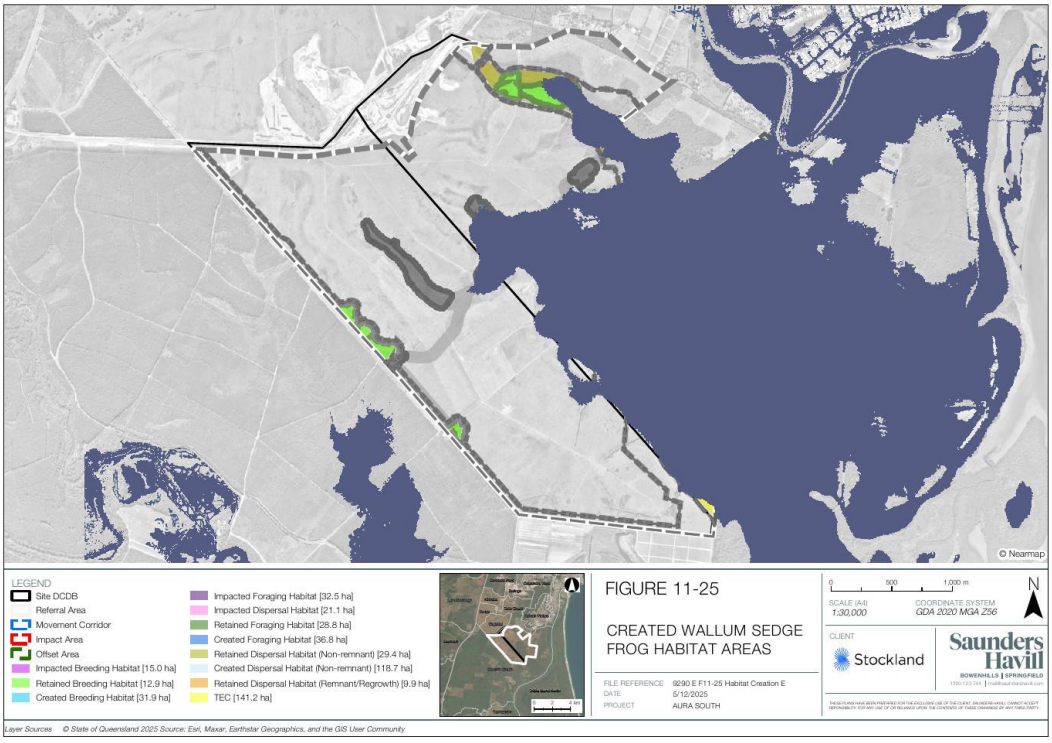


Figure 11-25: Created WSF Habitat

Figure 4: HAT in response to a sea level rise of 1.4m as mapped by Coastal Risk Australia applying upper likely sea level rise from IPCC AR6 projections for a warming of 3°C by 2150

Again OSCAR requests ongoing engagement with Stockland in relation to these environmental issues in order to see the highest and best outcomes achieved as is indicated in the Purpose of the Planning Act 2016.

Conclusion

Any balanced planning undertaken at Halls Creek is not in any way conditional on that site and could and should form the basis at other sites.

There are some components that potentially demonstrate balanced planning eg Housing and Transport but overall at this point in time Halls Creek, in our opinion does not represent balanced planning nor do the benefits outweigh the irreparable costs.

Given that this development is assured of going ahead, OSCAR and its member groups are willing to work with Stockland to understand and contribute to make a more sustainable development and one that comprehensively reflects the Purpose of the Planning Act 20

Yours sincerely,



Melva Hobson PSM
President OSCAR

Organisation Sunshine Coast Association of Residents Inc.