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Draft South East Queensland Regional Plan feedback
Department of Infrastructure, Local Government and Planning
BY EMAIL: SEQRegionalPlan@dilgp.qld.gov.au

Dear Sir/Madam,

Re: SUBMISSION ON DRAFT SEQRP

Thank you for the opportunity to make submissions on the draft South East Queensland Regional Plan (SEQRP).

Development Watch (DW) is a community group based in Coolum on the Sunshine Coast. One of our primary aims is to encourage policies and planning practices that preserve and enhance the quality of life in the Coolum district for both residents and visitors. We have prepared this submission with this aim in mind.

We commend the State Government on the presentation and setting out of the draft SEQRP.

We submit as follows.

"What You Told Us" (p10 and p11)

GROW—...one of the residents' strongest preferences is for medium density housing for, amongst other things, major coastal tourism centres. It is our view that not all coastal tourism centres are suitable for medium density housing - some would be more suitable for low density housing especially in areas of high scenic amenity.

We support the following comments:

PROSPER – *The regional plan should support innovation by establishing and enhancing new industries within SEQ, especially in tourism. .*

CONNECT - *Residents in SEQ want to ... get around by public transport, walking or cycling.*

SUSTAIN - *Residents want to see SEQ's natural assets protected from development and ... Residents want to protect SEQ's natural environment ...*

LIVE - *Residents recognize that 'density' does not have to mean 'high-rise'.*

CHAPTER 1 – SEQ TODAY

Top 5 Industries (p15)

We consider tourism to be the backbone of the economy for the Gold Coast and Sunshine Coast and we would like to see it included in the list of Top Industries.

CHAPTER 2 – A VISION FOR SEQ

Future opportunities and challenges (p23)

SEQ attracts people from around the world because of its climate, livability, economic opportunities, quality education and affordable living.

We would like to see “*tourism experiences and natural assets*” added to this description.

CHAPTER 3-THEMES:

GROW

The Next 25 Years (p30)

We note the population of the Sunshine Coast is predicted to grow from 287,500 in 2015 to 495,000 in 2041 (an increase of 207,500 over 25 years – or an average of 8,300 per year).

In the existing SEQRP population growth for the Sunshine Coast was predicted to grow from 295,000 in 2006 to 497,000 in 2031 (an increase

of 202,000 over 25 years or an average of 8,000 per year). For the 9 year period from 2006 to 2015 the population was therefore predicted to grow by approx 72,000 (an average of 8,080 x 9 years), estimating the population for 2015 at 367,000. It was 287,500 an approximate shortfall of 87,000.

Additionally, the population growth for the Sunshine Coast for the 5 year period from 2011 to 2015 (a 4 year period) was 20,000, only an average of 5,000 per year, significantly less than the predicted average of 8,000 per year in the existing SEQRP and 8,300 in the draft SEQRP. One must also take into account the ageing population and the effects once this current ageing population has passed on.

We note the figures are just projections and that there are peaks and troughs with population growth. May we suggest though that the 25 year periods perhaps be broken up into 5 year periods? Having Local Government continually remind residents that the State Government has told them they have to provide for X population growth in 25 years or 50 years only creates concern amongst residents as to how areas are going to cope.

Elements and Strategies – Element 1: Efficient Land Use (p33)

3. Prioritise the investigation, planning and delivery of urban development in suitable locations within the Urban Footprint that are underused.

We consider that "Underused" needs to be defined. We would not like to see hazard areas which might be in the Urban Footprint but which are not suitable for development to be considered as underused and now suitable for development.

Table 4: SEQ employment planning benchmarks (p37)

We would like to see Tourism included as an Industry.

Scales for density/infill housing (p40 and P41)

Whilst we appreciate the scales of the types of housing are just examples, we understand that the examples would differ greatly depending on the area to which the type of development is situated eg.

Medium rise in the Brisbane CBD would probably be high-rise to a lot of residents on the Sunshine Coast.

PROSPER

Our Organisation does not believe that rapid population growth creates prosperity for the community or the State or Local Governments. In fact, population growth, whilst it increases taxes and rates received by the Governments, and helps businesses, it also places considerable pressure on Governments to provide infrastructure, the costs of which far outweigh any taxes/rates received, especially if the Governments do not have the money to provide the infrastructure and have to borrow and pay interest on further debt. It is our belief that businesses only prosper from population growth if there is sufficient infrastructure eg. parking, traffic flow etc. We believe a period of steady rather than rapid growth would be beneficial in order to allow the Governments to catch-up on infrastructure projects and improve their debt levels.

We believe there should be a substantial contribution by developers to infrastructure.

CONNECT

It is our view that development should occur at a pace consistent with the State and Local Government's ability to provide the required connective infrastructure. It is most important that connective infrastructure be provided prior to the construction of a major development. If it is the Government's intention to increase densities, it must be able to provide the required connective infrastructure to support these density increases.

We believe there should be a substantial contribution by developers to connective infrastructure.

In relation to public transport, there is a lot of room for improvement on the Sunshine Coast. We would like to see more specific public/active transport initiatives that benefit the Sunshine Coast not only when travelling within the coast but also between the coast and Brisbane.

SUSTAIN

SEQ's natural assets (p66)

We agree the *SEQ has a rich mix of natural assets* and that Noosa National Park is probably the most iconic. More natural assets like the Noosa National Park would create many jobs as these assets attract many tourists from all over the world – we need more of these iconic sites in other parts of the coast, not just Noosa.

ELEMENTS AND STRATEGIES

Element 1: Traditional Owners (p68)

We agree *Traditional Owners should be engaged to enable their cultural knowledge and connection to regional land use and seascapes to be included in planning for communities and the sustainable management of natural assets and natural economic resources.*

Element 4: Natural resources (p68)

We agree with the strategy to *protect regional scenic amenity areas from development that would compromise their value.*

Element 5: Health and wellbeing (p68)

We agree with the strategy to *design communities to be walkable, attractive and comfortable and have high amenity environments ...*

Element 7: Climate Change (p69)

We agree with the strategy to *enhance the resilience and capacity of natural assets to adapt to climate change and buffer people, infrastructure and biodiversity from the impact of extreme events.*

Avoidance of exposure to high-risk areas is paramount. Serious options and principles for addressing adaptation to sea level rise and coastal hazard adaptation should be included. There could be more on avoiding future flooding eg audit of Qld Flood Commission of Inquiry recommendations.

We would like to see mention of renewable energy and water use efficiency e.g. reintroduce requirement for new houses to have rainwater tanks; reducing impacts of drought

Element 8: Safe (p69)

We agree with the strategy to *use disaster risk management planning and adaptation strategies and avoidance of exposure to high risk areas to minimize SEQ's vulnerability to development constraints and natural hazards.*

In this regard, for the sake of certainty, we would like to see high risk areas such as landslide areas, flood hazard areas etc. removed from the urban footprint. Also see our comment in Element 7 Climate Change above.

Scenic Amenity Areas (p74)

We believe Yaroomba on the Sunshine Coast should be classified as a Scenic Amenity Area. It has Mount Coolum as a backdrop (a unique landscape feature) and the Mount Coolum National Park. It contains a very unique parabolic dune. It also has one of the highest dunal areas on the foreshore which needs protecting. It is also one of the few pristine beaches left on the Sunshine Coast that does not have buildings towering above the treeline. It has many vantage points including the Point Arkwright Headland, Mount Coolum, the ocean and the lower hills behind.

We believe it is an area with multiple landscape values and should be considered as a Scenic Amenity Area.

LIVE

We agree with your statements regarding trees, green spaces and waterways.

ELEMENTS AND STRATEGIES

Element 3: Inspiration from local character (p77)

2. We agree with the strategy to *work respectfully with natural topography to create development that contributes positively to the visual experience of a place.*

Element 4: Working with natural systems (p77)

We agree with your strategies to *Respect and add to local landscape character and ecological diversity to create places that demonstrate a strong respect for nature. And 2. Conserve and protect significant trees as valuable community assets and use these features to enhance local character.*

We will be asking our Local Government to reinstate local laws in relation to the felling of trees once this Plan has been adopted.

Urban Footprint/Principles (p83 and p84)

...the Urban Footprint is not an urban zone and does not imply that all land can be developed for urban purposes ... and ... land in the Urban Footprint may be unsuitable for urban purposes for other reasons, including constraints such as flooding, land slope and scenic amenity and the need to protect significant vegetation ...

Development Watch is most concerned that flood-prone land is insufficiently quarantined from residential development by the existing Urban Footprint. We recognise the current SEQRP and this draft contain a note indicating inclusion of flood-prone land in the footprint does not mean residential development is a permitted outcome. However, the Sunshine Coast Council is in the process of submitting a major amendment to the State that will facilitate such a development.

A large portion of the Maroochy River flood plain is included within the Urban Footprint. Development interests own or have options to buy much of this land. We ask that the Urban Footprint be amended to exclude flood-prone land that is not yet developed for residential purposes. This would remove any doubt regarding the prohibition of such development.

Attached are two Local Plan Area Maps from the Sunshine Coast Planning Scheme 2014 (SCPS). They cover the area of interest of DW and each shows an Urban Growth Management Boundary, indicated by a solid blue line. We ask that the Urban Footprint boundary be modified to coincide with the blue line immediately to the east of the Sunshine Motorway. Most of this ex-caneland is inundated in a Q100 rainfall event.

NORTHERN SUB-REGION

Landscape areas and natural assets (p103)

Could not the Mount Coolum National Park be included in this?

Inter-urban break (page 103)

We commend the State Government for retaining the inter-urban break.

Integration of local government planning schemes with new SEQRP (p136)

We note that Planning Scheme amendments may be necessary in the integration of the new SEQRP with the Planning Schemes. Whilst we recognise this is a necessity, we would ask the State to bear in mind that the current Sunshine Coast Planning Scheme was only launched in May 2014. Since that time Council has embarked on an extensive process of Planning Scheme Amendments and the community has barely been afforded the certainty that the 2014 Planning Scheme was meant to provide.

Our Organisation had substantial input into the formulation of the SCPS and we therefore ask that the Sunshine Coast community be afforded a say, at all stages, on any major amendments relating to the integration process.

Yours faithfully,



Lynette Saxton,
President, Development Watch Inc.