

Development Watch Inc

PO Box 1076, Coolum Beach, QLD, 4573

ABN 53 627 632 278



www.developmentwatch.org.au

president@developmentwatch.org.au

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The Chief Executive Officer

Sunshine Coast Council

By Email: planningscheme@sunshinecoast.qld.gov.au

Dear Madam,

NOTICE OF SUBMISSION

PROPOSED SUNSHINE COAST PLANNING SCHEME 2014 (MAJOR AMENDMENT) **ADDITIONAL SEQRP 2017 SITES AND OTHER ZONING MATTERS**

Thankyou for seeking feedback from the community on these proposed Amendments.

Development Watch (DW) is an incorporated Association whose primary aim is to prevent inappropriate development in Coolum and surrounding areas and to monitor planning and decision-making processes to ensure that all local planning and relevant State Government laws are respected.

Whilst DW mainly concerns itself with Coolum and surrounding areas, in some cases where development outside the Coolum area could create a precedent for inappropriate development in Coolum, DW will broaden its interests.

Generally speaking, DW is opposed to major amendments to our Planning Scheme. These Schemes are put in place to provide certainty for communities. To continually make major amendments before Planning Schemes come up for review results in communities being taken by surprise and creates an enormous amount of uncertainty and angst for residents. This is not how these Schemes are meant to operate.

We do acknowledge that Council declared a need for an alignment amendment after the release of the SEQRP in 2017. That amendment took effect in 2018.

We are perplexed as to why Council is now proposing yet another round of major amendments and wonder why –

1. This Amendment adding to the SEQRP land supply could not have been included in the previous major amendment in 2018; or
2. This Amendment could not have waited until the SEQRP comes up for review, particularly bearing in mind that the land supply targets under the SEQRP have been met and there is sufficient land to the year 2,035.¹

Further, nowhere in the South East Queensland Regional Plan does it state that all areas have to contribute a certain amount of land.

In relation to the specific amendments proposed, we thank Council for its briefing. DW submits as follows.

Bli Bli – Change of Zoning from Rural to Emerging Community Zone

We note this Amendment comprises approx. 9 parcels of land totalling around 60 hectares.

The land is currently zoned rural and is extremely constrained in that it is subject to, amongst other overlays, the following –

- Flood Hazard Overlay
- Acid Sulfate Soils Overlay
- Biodiversity, Waterways and Wetlands Overlay
- Height of Buildings and Structures Overlay
- Scenic Amenity Overlay
- Landslide Hazard and Steep Land Overlay

This land sits within the Maroochy River Floodplain. DW is opposed to development on flood plains, particularly the Maroochy River Flood Plain.

Almost 50% of the land has been mapped by Council as falling within the Flood Hazard Overlay in the Planning Scheme and any development on that part of the site will result in unacceptable risks from flooding.

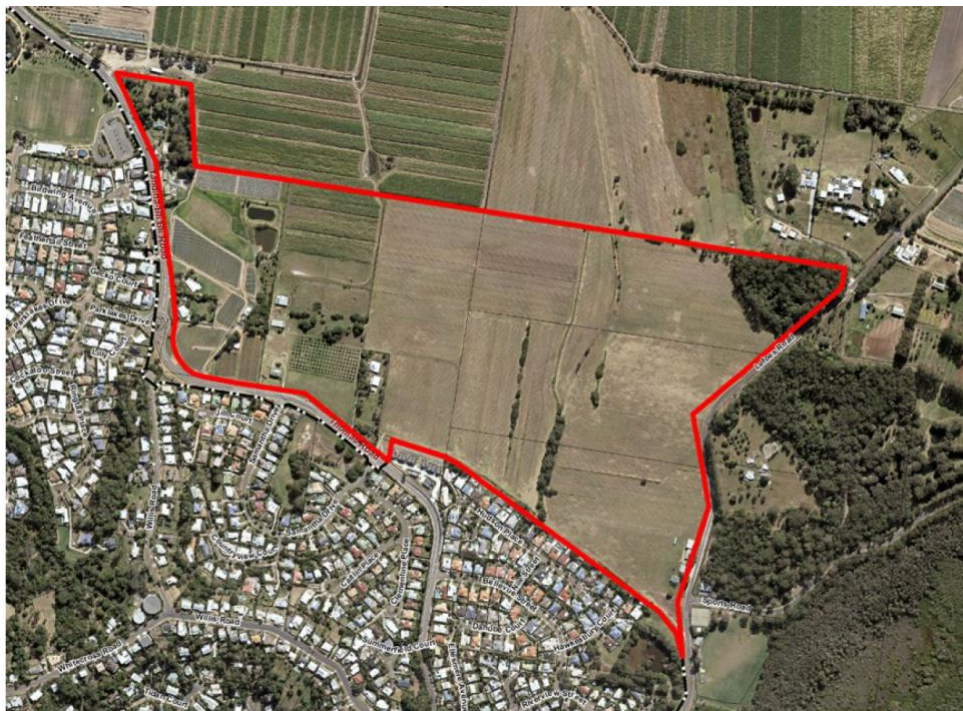
The proposed Amendment will put the safety of people and property at risk during a major flood event.

¹ <https://planning.dsdmip.qld.gov.au/planning/better-planning/state-planning/regional-plans/segrp/mtm>

DW believes Council should be exercising an abundance of caution in its dealings with flood prone land and that should mean not facilitating residential development thereon. At our briefing with Council officers DW was advised Council did not believe flooding was an insurmountable issue for this site. DW questioned Council officers about the studies and modelling supporting this proposed change and DW requested access to those studies and reports. Council officers said the reports were not currently publicly available but that they would seek approval for them to be made available to DW. DW looks forward to viewing this information.

More importantly, DW notes that Council is currently in the process of finalising its Coastal Hazard Adaptation Strategy (CHAS). We point out the following -

SUBJECT LAND



In the maps showing the High Astronomical Tide (HAT) and resultant permanent tide inundation we note the following stages for this site (shaded light blue) –

TIDAL AREAS – HAT PRESENT DAY



TIDAL AREAS – HAT 2041



TIDAL AREAS – HAT 2070



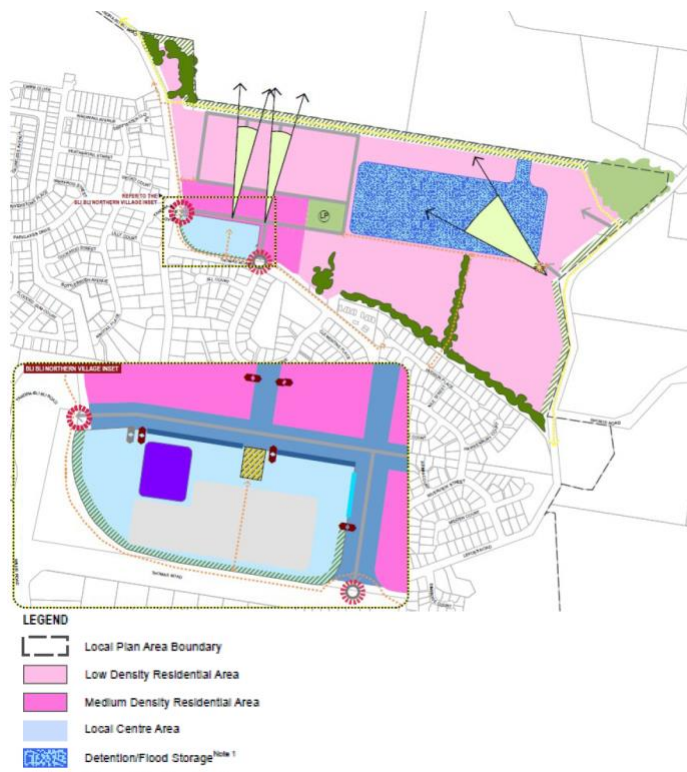
TIDAL AREAS – HAT 2100



Council will note the High Astronomical Tide and resultant inundation is already a problem for this land and will substantially increase over time. The CHAS should be finalised before Council makes a decision on including any flood plains but particularly this land at Bli Bli in this round of Planning Scheme Amendments.

Even when the CHAS is finalised however, any development of this site will create more hard surfaces and faster water run-off resulting in even worse potential inundation than that contained in these maps.

Whilst perusing Figure 4 – Proposed Bli Bli Village North Draft Masterplan DW raises concern at the inclusion of a very substantial flood retention basin ('constructed water body') within the site, the area hatched dotted blue below.



DW submits that the area occupied by this water body and the adjoining proposed residential areas to the north and east should be excised from the proposed rezoning and remain zoned rural due to the issues of flooding both now and into the future.

DW further questions whether the constructed water body is in fact a retention basin or could more readily be described as a land-locked 'lake' similar to that in the earlier stages of the Parklakes Estate near Halcyon? Whilst such water feature may serve some flood retention purposes it would also bring other undesirable outcomes into play.

These water bodies are difficult to maintain in pristine condition with weed infestation and water pollution often occurring. And there have been well documented legacy engineering problems emerging years later from features such as what seems to be envisaged.

The proposal to develop this land would result in a constructed waterbody that relies on mechanical pumping for lake turnover and will require an unacceptably high level of ongoing maintenance including repair and replacement costings for any post river flood clean-up; litter management; lake desilting; aquatic plant and algal bloom management.

The land is mapped within the Acid Sulfate Soils Overlay and the Biodiversity, Waterways and Wetlands Overlay in the Planning Scheme. Any constructed water body would require treatment of any groundwater both during construction and/or post construction when flooding occurs.

The constructed water body proposed will result in unacceptable water quality impacts both on-site and off-site and will also adversely impact on the downstream receiving environment, including existing tidal wetlands (Maroochy Wetlands) and the Maroochy River.

Further, Council and the community are well aware that water bodies such as this almost invariably attract unwanted insect infestation.

During our consultation with Council DW also raised the thorny issue of insurance for residents of flood prone neighborhoods. There is increasing evidence that, for obvious reasons, insurance companies are choosing to either charge substantially higher premiums in such areas, or just avoid insuring them altogether. It could be considered irresponsible for Council to advocate or facilitate settlement on these flood plains.

We note a height increase under the Height of Structures and Overlay. This height increase and in fact, the development itself will impact on the scenic amenity of this area and also on residents' views under the Scenic Amenity Overlay – noting there are approximately 8 significant viewpoints above this site. Residents could not have foreseen these changes when buying and/or building their homes.

We note the proposed Emerging Community Zone is to have a medium density commercial component similar to that of the Bli Bli Town Centre. DW has noticed considerable traffic congestion not only in the Town Centre but also between the Town Centre and Park Lakes. Placing another commercial centre in Park Lakes and then adding another up to 5,000 odd residents is not going to ease congestion. The addition of this site is not sustainable. The site is not supported by adequate infrastructure and will add to the already at times, unbearable traffic congestion in the Bli Bli area.

Bli Bli Amendment Conclusion

This land is significantly constrained in many ways.

With everything we know of Climate Change and the predicted increase in catastrophic events, it would be negligent of Council to allow development on these flood plains.

We note Council took a stand on not agreeing to development on the flood plains at Coolum West and DW congratulates Council for taking this stand. Council should be consistent and take the same view with this site at Bli Bli.

Given the non-urgent need for land supply under the SEQRP, we do not consider it necessary to risk people's lives and livelihoods by developing flood plains, particularly at Bli Bli or in any other area in this proposed amendment where flood plains form part of the site.

Ninderry Amendment

Whilst DW does not disagree with the proposed temporary use of caravan/motorhome storage and/or caravan/motorhome park for this site (as advised to us by the briefing with Council), we are concerned that there is no description of a "Temporary Use" in the Planning Scheme. If storage sheds for the caravans are constructed or hundreds of vans are lined up or sitting in a field, they would be a blight on the rural landscape. Creating a Temporary Use which is not defined in the Planning Scheme is too wishy washy and is open to misinterpretation or misuse. Further, this Temporary Use could lead to other types of development being conducted in the sheds (without Council's knowledge) or other uses such as Light Industry being sought down the track for this site ie. the sheds are already there.

DW believes it would be more prudent for Council to include a definition of "Temporary Use" for rural land and what is allowed under a "Temporary Use", in the Planning Scheme or alternatively, the landowner should lodge a DA that requires a Material Change of Use for the site.

Yours faithfully



Lynette Saxton
President, Development Watch Inc.