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To: The Chief Executive Officer
Sunshine Coast Regional Council
BY EMAIL

NOTICE OF SUBMISSION

Mass Transit Option and Growth

Development Watch welcomes the Sunshine Coast Council's invitation to participate in the community consultation on these matters. At the Sunshine Coast Council's request, Development Watch attended a Roundtable Workshop on 3 June 2021 at which time it became apparent there were two topics up for discussion: the first **Mass Transit Options**; and the second **Growth**. We have therefore dealt with both of these matters in this submission.

For the purposes of our submission:

<i>DW</i>	=	<i>Development Watch Inc.</i>
<i>SCC</i>	=	<i>Sunshine Coast Council</i>
<i>SCMTOA</i>	=	<i>Sunshine Coast Mass Transit Options Analysis</i>
<i>SEQ</i>	=	<i>South East Queensland</i>
<i>SHAPING SEQ</i>	=	<i>South East Queensland Regional Plan</i>
<i>LSDM</i>	=	<i>Land Supply and Development Monitoring</i>
<i>QGSO</i>	=	<i>Queensland Government Statistician's Office</i>

MASS TRANSIT

DW's primary concern with Mass Transit is the potential cost to all ratepayers of the SCC region.

The analysis in the SCMTOA and summarized in Table 84 appears to have an excessive bias against the far more practical bus options. The most significant of these perceived biases include:

- Questionable and very large estimates of the 'land use response' benefits accruing to tram and, to a lesser extent, tracked bus options – with none attributed to route bus. Over two thirds (\$1,255M) of the total benefits of \$1,849M calculated from having a tram mass transit option are attributed to 'Land Use Response'. Half [\$613M] of those very substantial 'Land Use Response' benefits are attributed to 'Land Value Change Due to Zoning and Density'. These benefits are not going to accrue to the community at large but could accrue in large part to developers. Without including the 'Land Use Response' benefits the Benefit/Cost Ratio for bus options at 0.7 is clearly and decisively better than the Tram options at 0.4.
- Under-estimates of bus fare revenue differences. There seems no obvious reason why projected bus fare revenues at \$67M would be less than half projected Tram fare revenues at \$141M given the projected patronages.
- Under-estimates of capital expenditure differences. It is unclear why as much as \$299M would need to be spent on a Bus project, whereas the estimated Tram costs of over \$1,000M could well blow out substantially.

DW believes that further unbiased scrutiny of the various cost/benefit analyses is likely to indicate that the bus options are, on balance, the most attractive. Accordingly, DW believes that in addressing the SCMTOA, SCC should decide that its preference is for upgraded route bus solutions for the foreseeable future. DW believes that by adopting this approach SCC would also be in a position to move immediately to negotiations with the State and Translink for much needed bus services improvements which could be rolled out progressively starting as soon as 2022. Council should then seek to immediately deploy the \$16M which it has set aside in the Transport Futures Fund toward bus service improvements. These improvements would obviously include upgrades in the Future Growth Corridor which could support any land use plans in that corridor.

A bus solution would hopefully –

- avoid the necessity for SCC rates increases for funding, by contrast with the rates increases which have occurred on the Gold Coast to fund their Tram service; and
- will not demand undue increases in residential density in the Caloundra/Maroochydore corridor by contrast with what is possibly being foreshadowed for a Tram solution.

It is relevant to note also that neither the Sunshine Coast Mass Transit project nor the Camcos Rail Project is listed in the recently released Infrastructure Plan for the 2032 Olympics. However, duplication of the rail to Nambour is. DW believes this clearly indicates that the State and Federal Governments do not believe Sunshine Coast Mass Transit has any current priority.

This is a further justification for SCC to change its focus to pursuing immediate substantial bus system upgrades and defer considerations of a Mass Transit system for the time being at least.

See further comments on all options in Appendix 'A' at the end of this submission.

GROWTH

ROUNDTABLE WORKSHOP

At this workshop on 3 June 2021, DW noted the following comments made by SCC –

- **SCC referred to problems associated with urban sprawl.** We note, however, SCC was previously accepting of Caloundra South and Palmview. Whilst urban sprawl removes valuable green space (something which DW is not in favour of), if an area has already been earmarked for inclusion in the urban footprint in ShapingSEQ¹ as is the case with Beerwah East, it will inevitably be developed. So if we wish to avoid these problems, it is at the ShapingSEQ consultation stage that we need to submit on this.
- **SCC said we needed to provide dwellings for those who desire to move to the Sunshine Coast.** DW does not believe that existing ratepayers and residents should be forced to provide for those who wish to relocate to the Sunshine Coast. Densification of this coastal corridor will force existing residents out because of the changes to the character of the area and they will then have to find somewhere to live on the Sunshine Coast.
- **SCC said that buildings in any densification along the coastal corridor will not have ocean views.** If buildings are allowed up to 8 storeys, DW believes some will have ocean views and if not, developers will push for greater heights to get those ocean views.

SHAPINGSEQ¹

One of the purposes of the **estimates** in ShapingSEQ is to **"inform"** Planning Schemes.

The FOREWARD to ShapingSEQ states:

*"This is a plan **for our community, by the community.**" and "... Consultation and engagement has been the priority **because we all have a stake in how we grow and thrive as a region.**"*

DW lodged a submission on ShapingSEQ focusing its attention on Coolum and surrounding areas.

Northern Sub-Region (SCC)

It is noted from ShapingSEQ there is an **estimated** population growth for the SCC region for the period from 2016 to 2041 (25 years) of an additional 191,600. Based on these estimates approx. 87,000* more dwellings will be needed to 2041 (see Table 16 in ShapingSEQ). This estimate is based on figures from the 2016 Census.

*This forecast was adjusted recently in the QGSO to 92,000²

¹ <https://dilgprd.blob.core.windows.net/general/shapingseq.pdf>

² <https://www.qgso.qld.gov.au/issues/3091/population-growth-qld-202012.pdf>

Growth by consolidation (infill development) (63% - 53,700 dwellings)

It is noted from the State Government's Fact Sheet "FAQs on ShapingSEQ"³ -

"'Consolidation' development could be a detached house, units, or a high-rise development. The term is not referring to the development type, rather, development location."

DW does not dispute that ShapingSEQ provides for some growth along this coastal corridor. This was at the request of the SCC in its preliminary submission to the State Government dated 4 December 2014⁴. DW is not aware of the community being consulted in relation to this preliminary submission and hence, this could be the reason why this proposed densification has come as a surprise to the residents in that area.

Growth by expansion (greenfield) (37% - 33,300 dwellings)

It is also noted from the State Government's FAQs on ShapingSEQ that –

"'Expansion' development could be a detached house or a unit (even high-rise depending on the circumstances). The term is not referring to the development type, rather, development location."

Page 122 states –

3. *"The intent to deliver new and more complete communities that are well-planned and serviced will be achieved in areas including:

 - a. *Beerwah East*
 - b. *Caloundra South and*
 - c. *Palmview"*..*

4. *"Beerwah East has been included in the Urban Footprint to acknowledge its potential to provide important land supply in the northern corridor. It integrates with Beerwah and is serviced by road and a passenger transport corridor"*

We note both Caloundra South and Palmview have already been developed.

³ <https://dsdmipprd.blob.core.windows.net/general/shapingseq-faq.pdf>

⁴ <https://www.sunshinecoast.qld.gov.au/Development/Planning-Documents/Submissions-to-State-Government/SEQ-Regional-Plan-ShapingSEQ-submission>

LSDM REPORT

The 2020 LSDM Report 'Residential'⁵ provides -

In the **Expansion area**, planned supply is about 40,500 dwellings, which is above the 33,300 dwellings required to 2041. The realistic dwellings are 32,700, which equals 18 years supply and above the 15 years supply required by Shaping SEQ. So no need for concern there.

In the **Consolidation area**, the current capacity of planned dwelling supply is about 41,400 dwellings, which satisfies the minimum 15 years of required supply, but it is about 12,300 less than the SEQ Plan target of 53,700 to be achieved by 2041. But 2041 is 20 years away. After the 2024 planning scheme there will be at least one other planning scheme before 2041 to address that shortfall. So no need for panic there.

Based on this information, there is therefore no need for the 2024 planning scheme to include any major new medium and high density allocations/land use density changes nor any new greenfield development areas.

MAKE YOUR WAY FACT SHEET

The Queensland Government's **Make Your Way Fact Sheet 14 re Population Growth**⁶ allocates a total of 92,000* additional dwellings by 2041 across various parts of the SCC region. 27.7% (25,500) of the required new regional dwellings to 2041 are slated for the full coastal urban corridor from Maroochydore to Caloundra. Of those 25,500 dwellings about 80% is already included in the existing planning scheme and 6,000 new dwellings were built in the 5 years since 2016. That means, only approx. 5,000 additional dwellings are needed between now and 2041. Arguably there is no need for additional medium/higher density land use changes to be included in the coastal urban corridor in the new 2024 planning scheme.

Either way, Beerwah East has residual capacity to meet a lot of population growth and additional dwelling requirements after 2041, so once again there is no need for Council to scaremonger about need for new greenfield sites in the 2024 planning scheme nor in its dealings with the State Government about the next SEQ regional plan.

*Adjusted forecast figure in the QGSO

LACK OF INFRASTRUCTURE

DW is concerned that any continuation of growth without adequate supporting infrastructure is not sustainable: if the stretch of Nicklin Way were rezoned in the next Planning Scheme, development

⁵ <https://planning.dsdmip.qld.gov.au/planning/better-planning/state-planning/regional-plans/seqrp/lrdm?release=2020&area=sunshine-coast&page=residential>

⁶ https://www.oscar.org.au/wp-content/uploads/2021/05/Population_Growth_FACT_SHEET_14.pdf

as a result of any increased density could go on for years and years before funding is provided for mass transit.

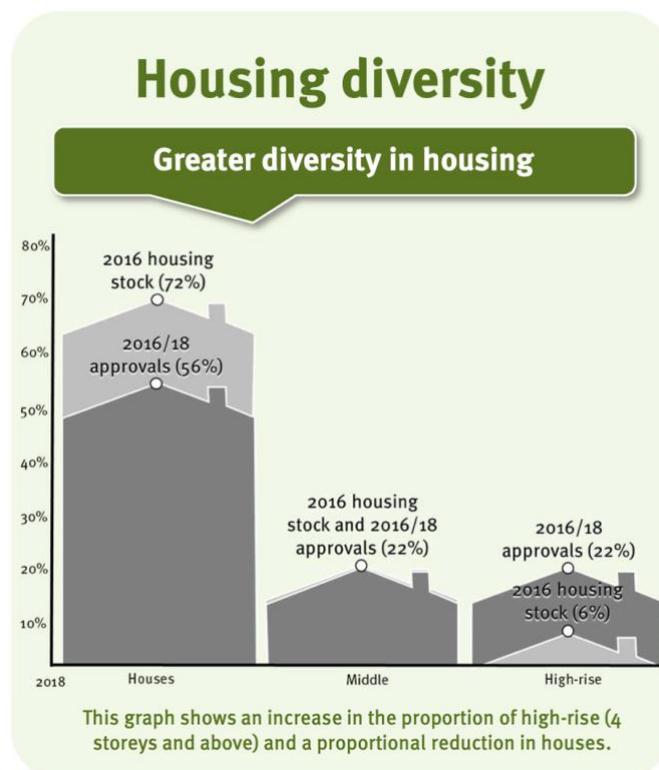
DW believes that whatever mass transit or transport option is decided on by the community, that option should be put in place first before any increases in density. That way the community can be sure that this is about public transport (Mass Transit) and not as a result of development being pushed by the development industry and lobbyists.

SUNSHINE COAST POINT OF DIFFERENCE

It has long been known publicly that the vast majority of Sunshine Coast residents “do not want another Gold Coast”. DW contends the Sunshine Coast needs a point of difference. This point of difference invariably should be “low to medium rise” rather than “high-rise”. DW believes that this type of point of difference to that of the Gold Coast would be advantageous not only because it is what the community wants but also it is good marketing from a tourism point of view.

DW does not support highrise nodes of up to 8 storey buildings along Nicklin Way. In our experience developers will inevitably push for 1 or 2 storeys more as was the case with Bokarina recently. That would then set a precedent for 9 to 10 storey buildings in the whole area not just along the Nicklin Way stretch. Based on precedent, the gaps in between the nodes will be filled in with 8 to 10 storey buildings and could then continue to the east and west. This is the Sunshine Coast, not the Gold Coast – the community want a point of difference to the Gold Coast. And there is no reference to high-rise for this area in Shaping SEQ.

Here is a diagram from the LSDM which indicates that buildings over 4 storeys are in fact considered to be highrise –



OVERALL CONCLUSION

1. Best transport option for ratepayers is an upgraded bus network. That would minimise the cost to ratepayers and would provide a service much sooner eg. by 2022-2023 rather than waiting for funding which may never be forthcoming.
2. None of the remaining options favoured by the SCC are financially viable or affordable and more importantly, they are not supported by the State or Federal Governments.
3. There should be no rezoning of any areas until the community's chosen transport option is put in place.
4. There is no need for the 2024 planning scheme to have any additional greenfield expansion sites and no need for additional medium and high density land use changes in the coastal corridor.

DW further requests that the submissions in relation to this public consultation be made public – personal information can be redacted. It is important that the community sees the SCC as being open and transparent as required under the *Local Government Act* and understands the reasons behind any recommendations put forward to the Councillors and the State Government.

Yours sincerely,



Lynette Saxton
President, Development Watch Inc.

Appendix A to Submission of DW dated 22 June 2021

The SCC has put forward nine options in the current consultative process to allow the community to identify their preferred approach. Development Watch contends that the current process being undertaken is biased and involves two main drivers.

These are:-

- (1) Urban densification through endeavouring to *placemake* the first stage area that would allow high rise and dense development 800 metres each side of the current Nicklin Way.
- (2) Need to service and link this then rezoned area to the Maroochydore CBD

The driver of any **Transport Strategy** should be first and foremost to service the needs of the current community while building in resilience to cater for increased but controlled growth as outlined in the SEQ plan.

Option Analysis

Business as Usual

DW Comment. This option is not supported.

It is obvious that the current transport network across the entire Sunshine Coast area fails to meet the needs of the diverse and geographically spread communities that make up the Sunshine Coast (that is from the Coast to the Range).

Current usage rates, even in more densely populated areas are poor. Any strategy needs to examine why this is the case and to then look to innovative ways to better promote and enhance usage now and into the future.

Road Network Upgrades in the Coastal corridor

DW Comment. This option is supported but it is only part of a solution.

This option is necessary regardless of any public transport initiative proceeding. Such planning to enhance the road networks needs to be mindful of how any such works are funded and scheduled to be delivered and how this meshes seamlessly with an appropriate public transport initiative.

Region wide bus service enhancements (more frequent with more direct routes and connections)

DW Comment. This option is supported.

In delivering on this option care needs to be taken by the SCC to ensure community feedback and buy-in are secured as service enhancements are identified. Use of the latest transport technologies particularly around pulse and flexible services, linked timetables and real time monitoring from a user perspective are critical to promote and keep usage rates high.

It is also important that the SCC works collaboratively with other tiers of Government to secure the delivery of CAMCOS while simultaneously supporting other initiatives such as more streamlined and faster rail linkages to Brisbane. This region wide approach allows service enhancements now while actively linking to planning for such things as suburban and intercity rail in the mid term. Under this option road network enhancement should also be undertaken (eg MRI)

Region wide bus service enhancements including improved bus shelters, sections of bus priority lanes and park and ride facilities

DW Comment This option is supported and links with the commentary to the option above. In providing a whole of region solution that supports the broader Sunshine Coast community (Coast to Range) the location and size of park and ride facilities as well as priority lanes for buses should be well researched to ensure we maximise opportunities and minimise disruptions to existing traffic flows and property owners

High frequency bus service running in dedicated kerbside bus priority lanes

DW Comment This option is not supported in its current format.

This is not a region wide transport solution. However the option could be further explored as a component of a broader and staged region wide strategy. Again due research is needed and any impacts understood on the existing road networks and property owners.

Bus Rapid Transit (BRT)

DW Comment. This option is not supported

The BRT would require significant infrastructure as it is understood rubber tyred trams/buses would operate in dedicated centre lanes sectioned off from existing road networks. This option is a step change over and above the previously described options and would cause significant separation from neighbouring communities. In particular it would effectively deliver an intrusive barrier in beachside locations such as Alexander Heads and surrounds. We contend that this separation of beach to the surrounding residential areas is not sufficiently identified in any of the fixed infrastructure options.

This option, like the other below mentioned options (identified and actively canvassed by the SCC) promotes the urban densification of the Kawana strip well above the community's current expectations (refer 800 plus objections from residents in the area lodged with the local Councillor) It could be argued that this densification has the clear potential to occur well before finances are or ever secured to construct any form of a BRT or light rail option.

Therefore the MRT strategy could well catalyse substantial densification in the Kawana strip with the actual delivery of an MRT transport option lagging well behind if ever realised. Any acceptance of an MRT option requiring major infrastructure needs to be fully funded before increased densification is considered.

Light Rail Transit (LRT)

DW Comment. This option is not supported

The LRT calls for significant fixed infrastructure including dedicated and fix rail in the centre of the road with overhead wires, barriers and stations and access bridges. The cost of this infrastructure, that only services a small area of the Sunshine Coast puts significant financial burden on the whole of the Sunshine Coast while offering little benefit to the broader community.

Like the BRT it isolates beachside communities and promotes substantial and unwarranted urban densification along the Kawana strip-Refer comments above.

Trackless Tram (TT)

DW Comment This option is not supported.

Like BRT and LRT this option is not a region wide solution and offers little benefit to the whole of the Sunshine Coast community. It does place the cost on all ratepayers regardless of benefit. Again this option promotes unacceptable urban densification. Refer comments above.

Wire Free Light Rail (wLRT)

DW Comment. This option is not supported.

Like all fixed infrastructure options it is exceedingly expensive in servicing only one area of the Sunshine Coast. Based on this initial cost of stage one, the system if adopted for other sections of the Sunshine Coast would be totally cost inhibitive for future Councils to roll out particularly if other tiers of Government are not supportive (as is the case now- Refer comments from Andrew Wallace MP Federal Member for Fisher).

Summary Comments

As stated previously any MRT option should not be a stalking horse to catalyse the substantial densification of the Kawana strip

Any MRT should be part of a public transport solution for the entire Sunshine Coast region
Any adopted MRT option must have due regard to the financial costs and how these costs are shared across the various tiers of Government.

No option should be progressed to implementation without appropriate community consultation around a fully costed and Commonwealth/State Government supported business case.

The SCC needs to bring to a close the current process and realign it to embrace CAMCOS, road upgrade opportunities and very importantly instilling genuine community consultation around all aspects of the Project. Any densification needs to be considered as part the Town Plan revision process.