



# FRIENDS OF BUDDINA LTD.

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## Submission: SEQ Regional Plan 2023 Update

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### Introduction

Friends of Buddina is a not-for-profit community group. The group shares information about social, economic, environmental and land use development issues that impact on residents, visitors and neighbouring communities.

Buddina is a coastal residential community that values its natural assets and casual beach lifestyle. It is home to approximately 4,250 residents and many species of wildlife. The Buddina foreshore provides significant nesting habitat for the endangered loggerhead turtle. Buddina maintains a unique and fragile balance between nature, its biodiversity, known coastal hazards and mankind – a balance that we feel needs to be protected.

Friends of Buddina advocates on matters of key community concern in balancing future urban development that ought to be environmentally and socially sustainable.

This submission on the *SEQ Regional Plan (SEQRP) 2023 Update* refers generally to the Sunshine Coast Regional Council (SCRC) Local Government Area (LGA) within the Northern sub-region of the SEQRP. We support the view that the ongoing **housing crisis is not an excuse for poor development in inappropriate locations** and other crisis such as climate change and loss of biodiversity warrant similar consideration in the 2023 Plan. Achieving better outcomes from developers requires improved measures imbedded into Planning Scheme outcomes.

This submission further references matters specific to the Kawana Waters Local Plan area (KWLPA) and key matters relating to:

- (a) limiting development on environmentally fragile land;
- (b) identifying that density increases occur with functional, adequate capacity of supporting infrastructure;
- (c) ensuring open and green space is neither reduced in area, nor reduced on a per dwelling basis within the KWLP area nor relocated to another LPA (as an offset).



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#### 1. Natural Hazard Risk – Coastal Environment (RESILIENCE: risk avoidance)

NO footprint increases, irrespective of current zoning, along the beachfront and all residential land that is included in the State declared "**erosion prone area**"<sup>1</sup>. The designated "**erosion prone area**" ought to be excluded from the urban footprint (no-go zone).

Land located in the State declared "**erosion prone area**" ought not be considered for any increases in urban purposes irrespective of where the land is located, either

- in an existing urban area; or
- in a planning scheme; or
- an urban footprint identified in a regional plan.

Development or redevelopment ought not occur unless the development is coastal-dependent development that cannot feasibly be located elsewhere.

#### **Specific to Kawana Waters Local Plan area coastal environment - proposed amendment**

NO footprint increases (infill/consolidation) in areas designated by the State as "**erosion prone areas**" along the Kawana Waters beachfront as mapped in the KWLPA (Buddina, Warana, Bokarina, Wurtulla). The 2015 State declared "**erosion prone area**" is generally 175m wide, from the *Highest Astronomical Tide* (HAT) and footprint increases here ought to be avoided.

Additional provision ought to be made beyond 175m up to 250m beyond the HAT, thus allowing for increased levels of risk associated with sea level rise and increased storm surges - a natural hazard risk that is continually escalating.

**Note:** The *Beach Protection Authority* (BPA), the former statutory body responsible for coastal management in Qld, proposed the mandatory resumption of the beachfront residential land at Buddina due to the immediate proximity to the sand dune, the narrow buffer zone and Buddina's history of ocean surge and extensive beach erosion, particularly following cyclonic activity in the 1970's.

The resumption proposal was rejected by Council due to financial constraints. The State then widened the coastal reserves south of Buddina by an additional 100 metres (5 chains) as a precautionary measure, prior to development progressing in those areas. Thus, the beaches of Warana, Bokarina and Wurtulla have little development within the breadth of 175m "**erosion prone area**".

However, the residential land along the beachfront at Buddina remains at high risk (and increasing). By comparison, existing residential development at Buddina is 30-50m from the HAT, whereas development along other KWLPA beachfront land is 160-180m from the HAT (now mapped in SCPS Coastal Protection Overlay which incorporates the State mapping of the "**erosion prone area**").

Much of the Buddina residential land located within the State declared "**erosion prone area**" is currently designated as Low density and limited to 8.5m in height. Reductions in height and density for other residential land at Buddina, within in the State declared "**erosion prone area**", have previously been proposed.

The coastal erosion and consequential risks are identified and confirmed in both State and Council mapping. This land ought not be subject to any height or density increases ("gentle" or otherwise) and ought to be **excluded from the urban footprint** (no-go zone).

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<sup>1</sup> <https://www.qld.gov.au/environment/coasts-waterways/plans/hazards/erosion-prone-areas>



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### 2. Natural Hazard Risk – Flood Prone Areas (RESILIENCE: risk avoidance)

NO footprint increases, irrespective of current zoning, in flood prone areas (no-go zone).

Land located in the flood prone areas ought not be considered for any increases in urban purposes irrespective of where the land is located, either

- in an existing urban area; or
- in a planning scheme; or
- an urban footprint identified in a regional plan.

Development or redevelopment ought not occur unless the development is essential and cannot feasibly be located elsewhere. In addition, State and local governments ought to disclose the way climate change poses both “physical” and “transition” risks to the residents and the economy, given the rise in extreme weather events.

#### **Specific to Kawana Waters Local Plan area flood prone areas**

The mitigation scenario in the Kawana Waters Master Drainage Study is only a conceptual design and its delivery is unfunded and unscheduled. If a particular site was to be filled, as per the mitigation scenario in isolation to the other mitigation works being completed, it would cause unacceptable offsite flood impacts (SCRC).

### 3. Biodiversity – Endangered Species (SUSTAIN)

NO footprint increases (no infill/consolidation) in areas within 250m of habitat of MSES endangered species (no-go zone). Specifically, this submission relates to coastal endangered species marine turtles.

Sunshine Coast beaches along Kawana Waters includes Buddina beach which is noted as one of the most densely nested habitats of all Sunshine Coast beaches by the endangered loggerhead turtles. Buddina beach reports 22% of all loggerhead turtle nests laid between Bribie Island (north) and Noosa. Endangered loggerhead turtle nesting habitat is also identified and mapped by the State for the Sunshine Coast region.

Footprint increases beyond the 250m distance from the habitat of endangered species might increase from 8.5m (2 storeys) to a height of 12m (3 storeys), then beyond a 500m distance increase to 4 or 5 storeys maximum height. This recognises the artificial light at night impacts on such species as endangered loggerhead turtles identified in the Federal government’s *National Light Pollution Guidelines for Wildlife*.

Development ought to be located in areas to avoid significant impacts on matters of national environmental significance (MNES) and consider the requirements of the *Environment Protection and Biodiversity Conservation Act 1999*. Matters of state environmental significance (MSES) are to be identified and development ought to be located in areas that avoid adverse impacts on MSES. Where adverse impacts cannot be reasonably avoided, they must be minimised through restricted development density and height restrictions, combined with stringent approval conditions.

#### **Specific to SCRC LGA within the Northern sub-region – Sustain Outcomes proposed amendment**

The outcomes for Sustain (page 206) references the SC Biosphere and Corridors to protect and nurture. However, references to coastal biodiversity, particularly our beaches, coastal vegetation, endangered species and the beach habitat has been omitted. Such an omission is likely to support inappropriate development densification in areas that currently supports habitat of endangered species, such as the loggerhead turtle nesting habitat.

**Please AMEND the SEQRP** outcomes for “Sustain” to include protection of coastal biodiversity, particularly endangered species such as marine turtles and their beach nesting habitat.



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### 4. Gentle Density and Dwelling Diversity (GROW)

*Gentle density & dwelling diversity* increases within existing residential housing areas are supported **only** in:

- areas where water, sewerage, pathways and road infrastructure has been updated and expanded to support proposed dwelling and population increases with appropriate open and green space increases;
- areas that are not within the State declared “*coastal erosion area*” (no-go zone);
- areas that are not subject to flood inundation (no go zone); and
- areas that are not within 250m of habitat of MSES endangered species (no-go zone).

All amendments to land-use plans ought to be prepared and subject to concurrent upgrades to infrastructure plans. Flawed assumptions abound that 40-50 year-old established urban development areas are likely to have appropriate infrastructure (particularly water and sewerage) to support density increases – evidence is required.

*Gentle density & dwelling diversity* might include duplexes, terraces, low-rise apartments, row houses, town houses supporting increases up to a maximum height of 3 storeys. However, *gentle density & dwelling diversity* is potentially “the squeeze” of medium density into low density areas to (intentionally) avoid rezoning, particularly on small lots and where existing infrastructure is old, limited and not intended for intensified development (water, sewerage, roads, green space & transport).

It is imperative that density definitions are established as mandatory to avoid unsustainable overdevelopment, labelled as “*gentle density*” on small lots. *Equivalent dwellings per hectare (edh)* is an appropriate measure.

It is also important to align density with building height and the number of storeys, particularly for code assessable and accepted development. The SEQRP 2023 review includes a focus on strengthening the narrative and policy. Incorporating just a few mandatory measures will ensure development opportunities are not “abused”, otherwise we’ll have more concrete jungles, few (if any) trees and limited liveability.

We acknowledge regional planning differs from city planning and propose LGA’s are required to mandate measures (as Overall Outcomes, not Acceptable Outcomes) in their new Planning Schemes, such as:

- LOW density is unsuitable for *gentle density* increases, beyond the capacity of the lot size.
  - LOW density ought not exceed 8.5m in height AND 2 storeys maximum;
  - one dwelling per 400m<sup>2</sup> of lot size;
  - 30 *edh*;
  - minimum 40% site cover; and
  - If greater density or height is sought, the DA must be subject to impact assessment.
- LOW-MEDIUM density is suitable for *gentle density* increases, depending on the capacity of the lot size.
  - LOW-MEDIUM density ought not exceed 12m in height AND 3 storeys maximum;
  - 30-50 *edh*;
  - minimum lot size 1000m<sup>2</sup> with minimum 40% site cover; and
  - If greater density or height is sought, the DA must be subject to impact assessment.
- MEDIUM density is suitable for both *gentle density* and overall density increases, depending on the capacity of the lot size.
  - MEDIUM density ought not exceed 15m in height AND 4 storeys maximum;
  - 50-80 *edh*;
  - minimum lot size 3000m<sup>2</sup> with minimum 40% site coverage; and
  - If greater density or height is sought, the DA must be “impact assessment”.
- HIGH density is suitable for overall density increases, depending on the capacity of the lot size.
  - HIGH density exceeds 15m in height AND greater than 4 storeys;
  - Greater than 80 *edh*;
  - minimum lot size 3000m<sup>2</sup> with minimum 40% site coverage; and
  - If greater height is sought than zoned, the DA must be subject to impact assessment.



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These measures (or similar) are critical in ensuring "the squeeze" of Medium density into designated Low density areas is arrested and community expectations supported and "trust" is reinstated in LGA Planning Schemes.

**For example**, the Sunshine Coast Regional Council has been undertaking this "squeeze" in the coastal corridor suburbs for several years, approving medium development density outcomes in low density zones, justified by their lack of a defined measurement for low density which therefore allows medium density outcomes (which is defined as 30-80 equivalent dwellings per hectare).

#### 5. Rezoning Commercial / Industrial land (GROW) Urban land-use opportunity

Consider infill/consolidation opportunities through rezoning of commercial and /or low and medium impact industrial land where residential development is likely a more suitable land-use, in particular where the land adjoins or is in close proximity to sporting and educational facilities.

The importance of industrial land supply is acknowledged, particularly as the SEQRP identifies that a SEQ-wide study will be undertaken to help resolve supply issues.

The sub-regional outcomes for the Sunshine Coast also acknowledge the importance of existing and new industrial areas being added through the New Planning Scheme. In the short-term, large parcels of land along the highway (within the Urban Footprint) provide opportunities for rezoning to low impact industrial land-use, e.g., Palmview. It is imperative that the identification of major new industrial land at Yandina, Beerwah and Beerwah East is accelerated and supply brought forward to provide opportunities for other land-use changes.

#### **Specific to Kawana Waters Local Plan area – rezoning from industrial to urban land-use**

For example, the Kawana Industrial Area, located at Warana on the western side of Nicklin Way is suitable for rezoning as mixed-use medium and high density residential development (up to a maximum height of 6 storeys).

The potential for transition is significant for all or part of Kawana Industrial Area to a wider mix of uses in the immediate short term and longer term to support housing diversity. This is an ideal "trial area" to demonstrate planning for sustainable development that reflects best practice outcomes in our changing environment. All such development ought to have minimum 6m landscaped frontages with shading canopies.

Some of this land is riverfront and some is opposite the football fields and sports facilities at Lake Kawana and located nearby several schools between Nicklin Way and Lake Kawana. All of this commercial/industrial land on the western side of Nicklin Way in the KWLPA is ideally situated within easy access of the Birtinya Town Centre (also referred to as the Kawana Town Centre), the hospital precinct and has existing public transport services between Birtinya and the Maroochydore CBD.

This proposal is subject to water and sewerage infrastructure being updated to support medium density urban use (funding synchronised with the development).

#### 6. Retention of Green and Open Space within developed areas (LIVE)

Urban renewal projects with increased dwelling densities and building heights must be supported by green and open space areas proportionate to the resident population. Sustainable growth management requires population increases should not deplete the ratio, say *5 hectares per 1000 residents*. Before density and building height increases approved, green and open space must be expanded within the boundaries of the proposed development area (not offset land acquired elsewhere to satisfy the ratio). Suburbs ought to simultaneously provide critical green space for human health and liveability, and homes for our urban wildlife.



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### Specific to Kawana Waters Local Plan area

The SCRC continues to promote the *Kawana Sports Precinct*: “Team sports take to our quality fields on a weekly basis, participating in rugby union, rugby league, soccer, touch and more ... The Precinct has access from both Nicklin Way and Sportsmans Parade and offers a range of facilities ... one international and six national sized football fields offering competition standard lighting ...”

<https://www.sunshinecoaststadium.com.au/kawana-sports-precinct/>

All existing green and open space ought to be retained between Kawana Way and Nicklin Way, particularly no new development nor new “enclosed” structures on the Kawana football fields that effectively removes green and open space and displaces local football clubs for most codes to other locations beyond the local area.

Accordingly, the proposed resumption of several Kawana football fields for an Olympic Basketball Stadium ought to be reassigned to a non-green, non-open space location. Potentially this might be either:

- reverting to the original proposal for the Olympic basketball events to be hosted in the proposed Sunshine Coast Exhibition and Convention Centre, within the Maroochydore City Centre. Early construction of the Entertainment Centre in the CBD, doubling for indoor sporting events make sense ... a location nearby the CBD Olympic Village with other housing planned in the Maroochydore CBD – it’s a more appropriate site. The PDA scheme notes the preferred land uses within the Community and Convention Precinct specifically includes “major sport, recreation and entertainment”. Why build twice? Build it once as the SC Exhibition and Convention Centre which hosts major indoor sporting events; OR
- an extension to the nearby USC Basketball Stadium which already has adequate infrastructure, parking & transport options.

The Planning Institute of Australia priority #12 supports “*protection and expansion of green and open space areas*” and to “*ensure green areas are a valuable asset in the new regional plan, and set benchmarks for future expansion of green assets in growth areas.*” We need to achieve minimum open space land relevant to Local Plan areas and ensure publicly accessible open space does not decrease in any Local Plan area by 2046, not just the LGA. “Offsets” for loss of open space in one Local Plan area should not be relocated to another Local Plan area.

### 7. Infill / Consolidation Opportunities (GROW) existing railway towns within the SC region)

Consider gentle density and dwelling diversity options in railway towns. Increased density and height (as appropriate) combined with diverse housing options (including mixed use) within walking distance the passenger train stations provide infill opportunities in the majority of existing railway towns – these already have significant public transport infrastructure investment. Railway towns provide immediate opportunities for social and affordable housing as these locations already have well-serviced transport infrastructure.

### 8. Infill / Consolidation Opportunities (GROW) new railway station opportunities

Consider infill opportunities within walking distance of the newly designated stations along the CAMCOS corridor (maximum height 12m and low-medium density) in addition to gentle density & dwelling diversity.

It is acknowledged that it is premature to make major changes in land-use in the SEQRP and the SCPS until the transport infrastructure supporting greater densities is funded and the timeframes identified in addition to other critical infrastructure such as water and sewerage.



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#### 9. 20% Social and Affordable Housing Components

There is an opportunity to mandate 20% social or affordable housing components for each and every development application that seeks to achieve the equivalent of 50+ equivalent dwellings or more per hectare. Such an option might apply to all residential development within the LGA Urban Footprint, including existing PDA's and proposed MDA's.

#### 10. Upscale to 35% of Residential small lot PDA's and MDA's to Multiple Dwellings

Is there an opportunity for 'small lot' residential housing PDA's (existing and new) to be modified and include consolidated development lots (3,000 m<sup>2</sup>)? These PDA's could be upscaled to include 35% assigned to multiple dwellings, preferably located adjacent to open space and parks, shopping centres, town centres and along key public transport routes.

Upscaled Medium density areas for multiple dwellings up to 15m in height could include diverse housing options such as terrace houses, townhouses and apartments (e.g., Aura could include an infill/consolidation component of 35% combined with a 25% social or affordable housing component on all unapproved lots). This upscaling in greenfield sites effectively creates infill/consolidation with the appropriate infrastructure.

#### 11. Upscale some of the CBD building heights in the Maroochydoore PDA and mandate 20% Social and Affordable Housing components in the Maroochydoore PDA

There is an opportunity to upscale the Minister's proposed 20% to 25% for social and affordable housing and mandate that component in each and every future residential development application within the PDA for the Maroochydoore CBD. Such an option ensures social or an affordable housing is not isolated to outlying areas and instead provides opportunities within the CBD including improved employment options.

The proposed amendment to the Maroochydoore City Centre Priority Development Area (PDA) Development Scheme (No. 3) is currently subject to public notification until Monday, 23 October 2023. Final Approval could be "delayed" in order to incorporate mandatory, upscaled to 25% social and affordable housing.

#### 12. Inter-urban Break and Aura South (Halls Creek PFDA) residential development

We acknowledge the importance of the Northern Inter-urban Break (NIUB) and the identification of a cadastral boundary referenced in the draft *ShapingSEQ 2023 Update*. We support the boundaries identified in 2017 SEQ Regional Plan, however, we do not support any extension of the NIUB into viable Potential Future Development Areas that would restrict supply and ultimately push up prices beyond affordability.

The Aura South (Halls Creek PFDA) ticks many boxes for shovel-ready residential development. As cleared former pine plantation, the land with direct access to the Bells Creek Arterial Road and the Bruce Highway, presents opportunities to optimise the value of that infrastructure. Also being directly adjacent to the community of Aura (Caloundra South) and a suitably elevated, largely flood-free site, it would leverage existing investment in roads, schools and existing amenities in Aura. Delivery within a 10 year time-frame (2033-34) ought to be a priority.

Although Beerwah East is an MDA, it is a long-term proposition, not an alternative to Halls Creek with its 10 year time frame. Beerwah East has 90+ year leases to be paid out, native title has not been extinguished, it has no developer assigned and environmental concerns have not been identified. Significant up-front investment and the high cost of getting blocks ready for market is the major impediment with a potential timeframe of 2040 plus.