

# Development Watch Inc

PO Box 1076, Coolum Beach, QLD, 4573



ABN 53 627 632 278

[www.developmentwatch.org.au](http://www.developmentwatch.org.au)

14 December 2012

Mr John Knaggs  
CEO  
Sunshine Coast Regional Council  
(by email)

Dear Mr Knaggs

Please find attached the Development Watch submission on the Draft Sunshine Coast Planning Scheme 2012.

Development Watch (DW) wishes to acknowledge the considerable work that has gone into the development of the Draft Sunshine Coast Planning Scheme 2012 and commends Council staff on their efforts.

We have also appreciated the availability of senior staff to meet with us and discuss issues in relation to the draft.

We are disappointed that the consultation period was short particularly in the light of the enormous volume of documents (over 2,000 pages) and the complexity of the plan.

We would appreciate the opportunity to make a presentation to Council in relation to our submission and elaborate on the many concepts and codes, overlays etc we strongly support as well as the significant issues of concern we have.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marian Kroon'.

Marian Kroon  
President

## 1 Introduction

Development Watch is a community based organisation whose primary aims are to:

- Prevent inappropriate development in the Coolool district
- Monitor the planning and decision-making processes that affect the Coolool district to make sure that planning schemes and laws are being appropriately implemented
- Increase public awareness of important development issues that affect the long-term quality of life in the area
- Promote population growth management practices that will control the rate of growth in the Coolool district to acceptable levels
- Influence local economic development efforts towards local small businesses
- Work closely with elected officials and Council staff to ensure the consequences of development proposals are accurately assessed
- Encourage greater public involvement in development issues by keeping members and the general public informed about local government actions
- Encourage policies and planning practices that preserve or enhance the quality of life in the Coolool district for both residents and visitors.

This submission largely focuses on those aspects of the planning scheme that are most relevant to Development Watch's key objectives. Our main focus is on planning policies and practices and the decision-making processes that impact on planning.

### Structure of the Draft Plan

- The use in the planning scheme of outdated data is disappointing. The Census 2011 data has been available for some time and other current economic data, for example, median house prices, is readily available.
- The draft planning scheme is very complex and whilst Development Watch appreciates that the structure has been imposed by the State Government the complexity and length have severely inhibited community comments on the draft. The complexity and short consultation period have combined to curtail Development Watch's ability to comment on every aspect on the Draft Plan plan. Failure to comment should not be assumed to be agreement.
- MP2000 included all the land in the region in a local plan. The Draft Plan however leaves large areas without a local area plan code. Local area plans (codes) provide the only mechanism for describing the *context and setting* and the *purpose and overall outcomes* for an area – an opportunity to describe the unique characteristics of an area and the intentions for the area's future development. Rural areas not covered by a plan are significantly disadvantaged as a consequence. This is not consistent with the Strategic Framework stated intent to protect the unique characteristics of each area, nor does it adequately support the protection of the scenic and vegetation diversity of the region.

## 2 Executive Summary

We believe the overall thrust of the draft planning scheme (also referred to as the draft plan) provides a sound framework for the future development of the region recognising its broad economic, social, cultural and environmental diversity.

Development Watch:

1. broadly supports the Strategic Framework and strongly support statements about maintaining the Sunshine Coast as a community of unique communities with a focus on low scale development and strong protection for the natural environment.
2. strongly agrees that development of the Palmer Cooloom Resort should be in accordance with the existing Master Plan, Plan of Development and the Infrastructure Agreement and this should be included in the Cooloom Local Plan not just as an Editor's Note. We have a very strong preference for the Resort having an international status as a tourist resort and not becoming a theme park. Coding the Resort as an emerging community zone is strongly opposed.
3. broadly supports the Cooloom Local Plan Code. In particular we support retaining the "small scale coastal village character and identity of Cooloom". However, Cooloom has been categorised as a District Activity Centre with an unclear catchment area. We oppose this categorisation and wish to retain the Cooloom town centre as a small scale "Local activity centre" servicing local needs and with small scale retail and business development. Residents prefer to travel to the nearby centres of Noosa, Nambour or Maroochydore to fulfil higher order needs rather than having large scale retail and business developments in the town. The Cooloom Local Plan needs to be amended to make it clear that there is no provision for any additional large scale business development in Cooloom and that the Cooloom Town Centre caters only for residents and visitors in the Cooloom Local Plan Area.
4. strongly supports limiting the retail and commercial activity in Cooloom West to within the boundaries of the local activity centre. No new large business development should be allowed in that activity centre.
5. strongly supports the gateway concept and the enhancement of the north, south and west gateways for Cooloom.
6. supports the height limits in the Cooloom local plan with the following exceptions
  - a. the 20 metre height in Cooloom Industrial Park is too high. It will create an eyesore for residents on the ridges in Cooloom and Ninderry and compromises the scenic area and scenic route identified in the Plan;
  - b. the 25 metre height in the Town of Seaside should be reduced to reflect the permissible height in the Master Plan for the area; and

- c. the 12 metre height for the Mt Coolum Local Activity Centre should be reduced to 8.5 metres to ensure that the views to Mt Coolum from David Low Way are preserved.
7. strongly objects to the Coolum Industrial Park becoming a high Impact regional industrial park. When the park was established it was intended to provide for local industry not regional industry. We also object to the future exclusion of lower impact industry. The Yandina-Coolum Road is not designed for the high traffic movement associated with a high impact and regional site. High impact industry that could, by definition, include dangerous goods, night time work and “significant offsite impacts in the event of fire, explosion or toxic release” should not be located in such close proximity to residential areas nor be sited in the middle of an environment and conservation management zone. The Coolum Industrial Park should remain a local low impact Industrial Park.
8. does not support the small dual occupancy precinct in the Coolum Local Plan as it could become a "ghetto". We would prefer dual occupancy scattered throughout the low density residential zones with appropriate restrictions on the number, location and lot size.
9. strongly supports the zoning of the land between Barns Lane and the Motorway as rural and its exclusion from the Urban Growth Management Boundary in the Coolum Local Plan. This is the western gateway to Coolum and its rural and natural landscape character should be retained.
10. strongly supports no urban development being permitted on the canefields to the west of Coolum.
11. considers the inclusion of part of the town of Marcoola, (Town of Seaside) in the Coolum Local Plan and Zone Map as inappropriate and note that the precinct map for the Town of Seaside is incorrect (LPM30).
12. strongly objects to the Yandina Creek local and state extractive resources continuing to be shown on the overlays given the significant decisions previously made by the Court and Council.

### **3 Major Issues**

#### **3.1 Coolum – Inappropriate Categorisation as District Activity Centre**

##### **3.1.1 Desired Outcome**

Coolum Beach Town Centre should be categorised as a Local (Full Service) Activity Centre which more appropriately aligns with the statements in the description of Coolum Beach in the Local Plan Code (7.2.9.3) and with what residents desire. The Coolum Local Plan Code should make it clear that the Coolum Town Centre is intended to meet the immediate needs of Coolum residents and visitors only.

##### **3.1.2 Background**

1. MP2000 classifies Coolum Town Centre as a “Village Centre” and at 3.11.3 states:

*This will be a small scale Village Centre, accommodating a mix of boutique retail, business and community facilities. Within this Planning Area, the scale of retail and commercial activities will be limited to serving the immediate catchment area of Coolum and will not serve a district or higher order function.*

2. In the consultation process leading to the development of the Draft Plan, Coolum residents were the most active, raising the most flags and making the most submissions. They expressed strong views about the nature of the town including:
  - a. *Keep small town, village, sea-side feel*
  - b. *Keep population the same, no over population, keep sustainable*
  - c. *Limited low key, low impact, low rise development*
  - d. *Density levels should be strictly adhered to, keep lower density, stop extra bedrooms, (eg media rooms/offices)*
  - e. *No high rise, low rise/scale, 2 storeys residential areas, 3 storey limit mixed use*
  - f. *Don't build too many commercial buildings*
  - g. *Protect foreshore from commercial/residential development*
  - h. *Attract small, interesting local businesses (i.e. not multi-nationals or chain stores).*
3. In the draft plan, Coolum Local Plan Code (7.2.9.3) states:
  - a. *“Urban development is limited..... so as to protect and reinforce the small coastal village character and identity of Coolum.....”*
  - b. *“No new large floor plate retail uses are intended to be established in the Coolum Beach Town Centre”;*
  - c. *“Development in Coolum Town Centre contributes to low-scale, compact coastal town with an intimate village character.....”*
  - d. *“...low key coastal urban community with a strong focus on tourism.....”;*
  - e. *Development....reinforces the frontage to Coolum Esplanade as the tourism focus area....”;*
4. The draft plan envisages Coolum Beach will be a district activity centre and Coolum West will be a local (full service) activity centre. The “catchment area” for Coolum is unspecified in the Coolum local plan.
5. Resident population growth in the Coolum Beach area has been stagnant over the last ABS Census period.

### **3.1.3 Issues and Commentary**

1. Coolum residents have made their strong views about retaining Coolum as a small village well known. Residents would prefer to travel to nearby major activity centres to fulfil their higher order needs than have large scale business activity of any kind in Coolum.
2. The statements about the Purpose and Overall Outcomes in the Coolum Local Plan Code referred to above are clearly intended to retain Coolum Beach’s small scale village character. District Activity Centre classification is clearly not consistent with these statements. A reclassification to Local (Full Service) Activity Centre would be much more consistent.
3. Coolum Beach, and in particular the Esplanade is a “tourism focus” area. It is inconceivable that the main business and commercial centre for the district would be located in a tourism focus area intended to offer picturesque beach settings, relaxed coastal living and tourist resorts.

4. There has been considerable development of business activity in the area north of the Maroochy River over the last 10 years. Larger supermarkets have been constructed at Pacific Paradise, Peregrin Springs and Coolum West and a new large supermarket in Coolum Beach Town Centre. There are medical and dental clinics, small hardware stores and other small retail and commercial developments scattered across this region. These fulfil the day-to-day or immediate needs of their communities. The major centres of Noosa, Nambour and Maroochydore, designed to meet higher order needs, are a short drive away and residents have indicated that they prefer to drive to these centres rather than have larger scale business activity in Coolum Beach. Therefore there is no need for Coolum Beach to become a district activity centre.
5. The Coolum Local Plan does not envisage any new *large floor plate retail uses* (a statement DW strongly supports although we seek to amend it to *medium or large floor plate business activity uses*). Senior Council staff advised that “large” in this context means around 2500m<sup>2</sup>. There is also very limited land available in the Town Centre therefore it cannot grow to become a district centre, again making the categorisation as a District Activity Centre inappropriate.
6. Whilst the Coolum Information Sheet on the Coolum Local Plan indicates that the intended catchment area for Coolum as a District Activity Centre is limited to the area described in that Local Plan, the Local Plan itself fails to define the catchment area. Irrespective of the categorisation of activity centre this plan should make clear that the Coolum Town Centre is intended to meet the immediate needs of the Coolum Beach Local Plan area residents and visitors only.
7. There would be no disadvantage to categorising the Coolum Town Centre as a Local (Full Service) Activity Centre. There are few uses that are consistent for a district centre that are not available in a local (full service) centre or that have not already been developed (such as a hotel). It is highly unlikely that other uses such as a hostel or residential care facility would be built in the prime real estate precinct of the Coolum Town Centre. However, there are advantages to categorising it as a Local Activity Centre as it protects the Town Centre and maintains the intended character of Coolum Beach.

### **3.1.4 Conclusion**

It is clear from the above that Coolum Beach has been inappropriately categorised as a District Activity Centre. The activity centre category for Coolum should be changed to local (full service) activity centre and the local plan should clearly state that the Coolum Town Centre is intended to meet the immediate needs of the local residents and visiting tourists only.

## **3.2 Coolum High Impact Regional Industrial Park**

### **3.2.1 Desired Outcome**

The Coolum Industrial Park should remain a low impact industrial zone rather than a high impact zone. A low impact category better meets the desired characteristics of the Coolum Local Plan area (as specified in the Coolum Local Plan Code, 7.2.9.3 of the Draft Sunshine Coast Planning Scheme 2012).

## 3.2.2 Background

### 3.2.2.1 Maroochy Plan 2000

The Maroochy Plan 2000 specified in the ‘statement of desired character’ for the industrial land, then known as the Yandina – Coolum Road Industrial Precinct <sup>1</sup>

The precinct was intended to accommodate:

- *“business and industry uses with local and district markets;*
- *rural plant and equipment supplies, produce stores and rural service agencies,*
- *small to medium sized automotive repairs and sales,*
- *small-scale transport storage and distribution, and*
- *building trades, service trades and domestic services to businesses and households.”*

It was to develop as a ‘*moderate sized industrial and employment area, which serves the Coolum and South Peregian areas*’.

It also identified that the industrial area was “*adjacent to areas of significant vegetation. These remnant vegetation areas need to be effectively buffered to ensure that construction and operational activities of industry do not adversely impact on the sustainability of the vegetation communities.*”

Importantly, it recognised the importance of integrating seamlessly into the surrounding environs by maintaining “*high standards of siting, design and landscaping particularly along its frontages to the Yandina-Coolum Road and the Sunshine Motorway.*”

“*Stormwater drainage needs to be well managed, both for construction works and for on-going use of the land, to prevent sedimentation and other pollutants from entering the nearby ecologically significant and sensitive bushland and wetland areas.*”

It identified the need to establish, “*a well vegetated open space buffer along the Precinct’s northern boundary .... to assist in environmental management and maintain the visual amenity of the locality.*”

#### 3.2.2.2 Draft Planning Scheme – Strategic Framework

The Enterprise Opportunity Table<sup>2</sup> describes regional enterprise opportunity areas as “large enterprise areas of regional significance with high levels of access to regional freight corridors, proximity to a workforce and adequate separation from incompatible land uses so as to accommodate some industry - high impact uses.”

In the same table, the proposed locations for such parks are Coolum Industry Park, Sunshine Coast Airport Industrial Park, Sunshine Coast Industrial Park and Sippy Creek

---

<sup>1</sup> Maroochy Plan 2000 –Volume 3 Planning Areas, Precincts and Precinct Classes, Planning Area No.12 – South Peregian, 3.12.4 Statements of Desired Precinct Character, (4)Yandina-Coolum Road Industrial (Precinct Class = Core Industry) Core Industry p 213

<sup>2</sup> Draft Sunshine Coast Planning Scheme 2012, Strategic Framework, Table 3.4C Enterprise opportunity areas p75

Regional Enterprise Opportunity Area (or an alternative site which is to be subject to further investigation within the life of the planning scheme).

### 3.2.2.3 Draft Sunshine Coast Planning Scheme – High Impact Industrial Zone

The characteristics of a High Impact Industrial zone are in stark contrast to those of a 'Core Industry' (above).

The Coolool local plan code (7.2.9) of the Draft Sunshine Coast Planning Scheme 2012 in the section "Purpose and overall outcomes" (7.2.9.3) paragraph (h) states that development in the high impact industry zone provides for a, "*diverse mix of high and medium impact industrial uses set within an integrated, modern and visually appealing industry park with a high level of environmental performance and is designed to service the Sunshine Coast Region.*"

*"The industry park is protected from incompatible development that may adversely affect operations and avoids adverse affects on adjoining environmental areas."*

The Industry Threshold Table <sup>3</sup> for high impact industry, lists examples additional to those listed in the defined uses, such as facility for the storage and distribution of dangerous goods not involving manufacturing process, concrete batching and producing concrete products, abattoir, waste disposal facility (other than waste incinerator), to name a few.

**High impact industry zone code**<sup>4</sup> classifies various uses in a High Impact Industry Zone as either "consistent" or "inconsistent" uses. It is important to note that 6.2.11.2 Purposes and Outcomes paragraph 2n(ii) states that *"the uses listed as inconsistent uses in column 2 of Table 6.2.11.2.1 (are) not to occur in the High impact industry zone."* These inconsistent uses include all business activity uses except small food outlet and service station and also include all low impact industry activities. (see Low Industry Code 6.2.9 and Table SC1.1.3 Industry Thresholds). Further, the Assessment Table, 5.5.11 High impact industry zone<sup>5</sup> reinforces the inconsistent business and light industry uses by requiring them to be Impact Assessable.

### 3.2.2.4 SEQ Regional Plan 2009 – 2031

The SEQ Regional Plan sites the need for future planning in identifying land suitable for high impact industry.<sup>6</sup>, "*Investigations are underway in southern Queensland to identify a 50-year landbank for large-scale and high-impact industries to service the SEQ region. Studies are required to determine the suitability of areas within the region for these types of industries. Such investigations would typically address a wide range of environmental, land use, social, and infrastructure issues. .... Morayfield Business Park Enterprise, Wulkuraka Industrial Area, Coolool Industrial Area, Steiglitz Enterprise Areas and North Maclean Enterprise*

---

<sup>3</sup> Draft Sunshine Coast Planning Scheme 2012 Schedule 1, Table SC1.1.3 – Industry Threshold Table p S1-25

<sup>4</sup> Draft Sunshine Coast Planning Scheme 2012, 6 – Zones, 6.2.11 High Impact Industry Zone Code p 6-35

<sup>5</sup> Draft Sunshine Coast Planning Scheme 2012 5 – Tables of Assessment, Table 5.5.11 High Impact Industry Zone p5-50

<sup>6</sup> SEQ Regional Plan, 9-2 Enterprise Opportunities -. South East Queensland Regional Plan 2009–2031 p122

*Opportunity Area are considered for long term development.*”. The Coolum community has not been provided with the results of any study related to the Coolum Industrial Area.

### **3.2.3 Issues and Commentary**

#### **3.2.3.1 Coolum Industrial Park Unsuitable for High Impact Industry**

The background section highlights the need for land for high impact industry as identified in the SEQ Regional Plan. The characteristics of such land as identified in the Strategic Framework (see Background) are “high levels of access to regional freight corridors, proximity to a workforce and adequate separation from incompatible land uses”. The Coolum Industrial Park does not have high levels of access to freight routes and the park is located in close proximity to the communities of Peregrin South (580m) and Coolum.

#### **3.2.3.2 No Access to Regional Freight Corridors**

According to the Strategic Framework Map 3 – Transport Elements<sup>7</sup>, the Coolum Industrial Park does not have access to any of the intra-regional priority 2 freight corridors (as per the SEQ Regional Plan 2009 – 2031). This means that much of the freight traffic would be thrown onto the already stretched and inadequate Yandina – Coolum Road. This is a highly undesirable outcome from both a safety and a traffic congestion perspective.

#### **3.2.3.3 Inadequate Separation from Incompatible Land Uses**

The definition for High Impact Industry is<sup>8</sup>, “activities that include the manufacturing, producing, processing, repairing, altering, recycling, storing, distributing, transferring, treating of products and have one or more of the following attributes:

- potential for significant impacts on sensitive land uses due to offsite emissions including aerosol, fume, particle, smoke, odour and noise;
- potential for significant offsite impacts in the event of fire, explosion or toxic release;
- generates high traffic flows in the context of the locality or the road network;
- generates a significant demand on the local infrastructure network;
- the use may involve night time and outdoor activities;
- onsite controls are required for emissions and dangerous goods risk.

None of these attributes is compatible with the close proximity to the residential development in the southern boundaries of Peregrin Springs, the western boundaries of Coolum and Arcoona, Leichhardt and Musgrave Roads at Yandina Creek.

The Priority Infrastructure Plan Map<sup>9</sup> shows the Industrial Park abutting both a Conservation Estate and Environment Reserve. Again, none of the attributes listed for high impact industry are compatible with either of these areas. Such an industrial zone abutting a sensitive Conservation Area / Environment Reserve makes it almost impossible to comply

---

<sup>7</sup> Draft Sunshine Coast Planning Scheme 2012, Strategic Framework, Strategic Framework Map 3, Transport Elements p86

<sup>8</sup> Draft Sunshine Coast Planning Scheme 2012, Schedule 1, Table SC 1.1.1 Table of Use Definitions pS1-6

<sup>9</sup> Draft Sunshine Coast Planning Scheme 2012, Schedule 2, PIPMF30 - Priority Infrastructure Plan Map - Open Space, Community Facilities and Recreation Trails Network.

with the Coolum Local Plan provision which seeks to ‘avoid *adverse affects on adjoining environmental areas*’.<sup>10</sup>

The Strategic Framework continually refers to the importance of tourism to the Sunshine Coast. As an example<sup>11</sup>, “Tourism continues to be a strong contributor to the regional economy”. Risking the degradation of the natural attractions offered to the tourist industry in the Coolum Local Plan area by authorising high impact industry would appear to be counter-productive. Similarly, heavy industry traffic does not contribute to the scenic amenity tourists are expecting. The worst case scenario would be to threaten the ongoing economic viability of the Coolum Local Plan Area.

The Biodiversity, Waterways and Wetlands Overlay<sup>12</sup> show that Koala Habitat encroaches onto Coolum Industrial Park. Again, the attributes listed for high impact industry are incompatible with Koala Habitats.

#### **3.2.3.4 Disadvantages Current Occupants of the Coolum Industrial Park**

Many of the current occupants, who purchased the sites in good faith, would be severely disadvantaged by the proposed category upgrade. The majority of the existing buildings have been designed to house industry and business activities which the High Impact Industry Zone would consider “inconsistent” and require impact assessable applications. This will have the potential to devalue property on the estate.

Also, residents in the surrounding communities could never have envisaged such an upgrade.

#### **3.2.3.5 Scenic Amenity**

The Scenic Amenity Overlay Map<sup>13</sup> shows a scenic route enveloping the Industrial Park and that the edge of the park is shown as having scenic value. The Coolum Local Plan Elements<sup>14</sup> shows many of the Scenic Views in sight of the Industrial Park. This is not compatible with the Height of Buildings and Structures Overlay<sup>15</sup> which shows a height limit over the whole Industrial Park of 20 metres.

Residents on the hillsides in Coolum, in Coolum Ridges and residents at Ninderry would have their scenic amenity significantly compromised.

### **3.2.4 Conclusion**

An industrial park designed to service high impact industry is inappropriate for the Coolum Local Area. It should remain a low impact industrial park.

<sup>10</sup> Draft Sunshine Coast Planning Scheme 2012, 7.2.9 Coolum Local Plan Code, 7.2.9.3 “Purpose and overall outcomes” paragraph (h) p 7-90/91.

<sup>11</sup> Draft Sunshine Coast Planning Scheme 2012, 3.4.1 Strategic Outcomes p68

<sup>12</sup> Draft Sunshine Coast Planning Scheme 2012, OVM30Ci – Biodiversity, Waterways and Wetlands Overlay

<sup>13</sup> Draft Sunshine Coast Planning Scheme 2012, OVM30M – Scenic Amenity Overlay Map

<sup>14</sup> Draft Sunshine Coast Planning Scheme 2012, Figure 7.2.9A – Coolum Local Plan Elements

<sup>15</sup> Draft Sunshine Coast Planning Scheme 2012 – OVM30i - Height of Buildings and Structures Overlay Map

The category of high impact conflicts with the majority of the ‘Purposes and Overall Outcomes’<sup>16</sup> listed in the Coolum Local Plan. The road network necessary to support such a regional enterprise opportunity has not been designated for the Coolum area in the SEQ Regional Plan 2009-2031. The surrounding area, residential and environmental, could not cope with the pressures exerted by such high-end industry. The scenic amenity of the area as described in the Draft Sunshine Coast Planning Scheme 2012 would be severely compromised by both the high impact industry and the proposed height limit to apply to that industry.

If the high impact category was implemented the restrictions placed on new service and support industries wishing to relocate to Coolum would have the potential to severely curtail economic development in the Coolum area.

### **3.3 Palmer Coolum Resort – Inappropriate Categorisation as Emerging Community Zone**

#### **3.3.1 Desired Outcome**

The Palmer Coolum Resort (the Resort) is inappropriately categorised in the Draft Plan as an "emerging community zone". A new zone category and zone code should be created to guide the future development of the Resort and to guide the establishment of new "integrated tourist resorts". Future development of the Resort in accordance with MCU05/0245 should be enshrined in the plan, not in an Editor's note.

#### **3.3.2 Background**

The Resort was designated in the 1980s as an Integrated Tourism Resort by the Federal Foreign Investment Review Board (FIRB), as it was to be developed by foreign interests. Other resorts with this designation are listed at [http://www.firb.gov.au/content/real\\_estate/accommodation/resorts.asp](http://www.firb.gov.au/content/real_estate/accommodation/resorts.asp). Since that time, the Resort has been commonly called an integrated tourism/tourist resort/facility. MP2000 defines "Integrated tourist facility" as premises which:

*"(a) are used primarily for facilities and activities which attract, accommodate and entertain tourists where some facilities are open to the public use; and  
(b) are on a land extensive site; and  
(c) include two or more buildings; and  
(d) are developed in an integrated way, and managed as one entity; and  
(e) may include provision for conference facilities and for permanent residential accommodation."<sup>17</sup>*

Under MP2000, the Resort was designated as the precinct class, "Master Planned Community". This precinct class recognises major existing, standalone, integrated tourist/residential resorts within the Shire.

<sup>16</sup> Draft Sunshine Coast Planning Scheme 2012–7.2.9Coolum Local Plan Code 7.2.9.3 Purposes and Overall Outcomes p7-90

<sup>17</sup> MP2000, Vol 1, Section 3.3, Use Definitions

During the ownership of the Resort by the Lend Lease Group, Council approved a Master Plan of development (MCU05/0245) that allowed for a significant increase in the residential dwelling component of the Resort.

### **3.3.3 The Draft Planning Scheme**

#### **3.3.3.1 Coolum Local Plan Code**

The performance outcome for the Resort (PO15) states that development “*maintains the primary function of the site as an integrated tourist facility*”. The term “integrated tourist facility” is not defined in the Draft Plan. DW prefers the term “integrated tourist resort” as it more closely aligns with the function of the Resort.

The acceptable outcome for the same PO contains an editor's note, “*Development in the Emerging community zone at Palmer Coolum Resort is currently regulated in accordance with an approved Master Plan and Plan of Development.*” Editor's notes in the Draft Plan do not have the force of law.

#### **3.3.3.2 Emerging Community Zone Code**

This proposed code for the assessment of development at the Resort does not require development in the Resort to be undertaken in accordance with the approved Master Plan and the Plan of Development. This is a serious oversight. The absence of a specific mention of the Resort in Table 6.2.17.2.1 is also not conducive to the orderly development of the Resort in accordance with approved development plans.

### **3.3.4 Development Watch Recommendations**

There is strong community support for the continued development of the Resort as an internationally recognised tourist resort. Development Watch is most concerned that the Draft Plan does not legislate for this. Planning provision for the development of new “integrated tourist resorts” on the Sunshine Coast should also be made. To achieve this, we make the following recommendations:

- A new zone category and zone code should be created to guide the future development of the Resort and to guide the establishment of new “integrated tourist resorts”.
- The term “integrated tourist facility” or similar should be clearly and comprehensively defined.
- Future development of the Resort in accordance with MCU05/0245 should be enshrined in legislation. An “editor's note” is a most ineffective way to guarantee this.

## 4 General Issues

### 4.1 Dwelling Density

#### 4.1.1 Desired Outcome

The Draft Planning scheme, Schedule 1 – Definitions is amended to include a definition of “bedroom” to make clear that rooms such as media rooms, sewing rooms and studies/offices etc that can be converted to a bedroom are counted as bedrooms for the purposes of calculating dwelling density.

#### 4.1.2 Background

1. MP2000, Volume 1 includes the following definition:  
*“**Bedroom**” means a habitable room designed and constructed or capable of being adapted so as to be suitable for use as a bedroom. This term includes a sewing room, music room, study, computer room or the like*
2. Permitted dwelling density in the Draft Plan is outlined in Part 6 for each of the relevant zones. For example, the Medium Density Residential Zone states at 6.2.2.2 (2):  
*(g) except where otherwise specified in a local plan code, development provides for residential activities at a density of between 25 and 50 equivalent dwellings per hectare;*
3. Equivalent dwellings is defined in the Draft Plan, Schedule 1 as follows;  
**Equivalent dwelling** *The equivalence factor used to calculate residential density where:-*
  - (a) a rooming unit equals 0.35 equivalent dwellings;
  - (b) a one bedroom dwelling equals 0.7 equivalent dwellings;
  - (c) a two bedroom dwelling equals 1 equivalent dwelling;
  - (d) a three bedroom dwelling equals 1.35 equivalent dwellings; and
  - (e) a dwelling with four or more bedrooms equals 1.7 equivalent dwellings.
4. There is no definition of bedroom in the Draft Plan.

#### 4.1.3 Issues and Commentary

1. Failure to include a definition of bedroom (as per the MP2000 definition) will have a significant impact on actual density. The intention of the Draft Plan to control density will NOT be realised. Actual density will be much higher than intended. For example:  
 A multi-unit development on one tenth of a hectare, should be limited to between 2.5 and 5 two bedroom units (according to the Draft Plan Medium Density Zone requirements, 6.2.2.2.(2)(g)).

However a developer could include a sewing room and a computer room in each unit. Effectively each unit would then be a four bedroom unit. The allowable maximum density on the site should then be between 1 and 3 four bedroom units. The consequence, without the definition of bedroom being applied, is that the development could have nearly twice the density envisaged by the Draft Plan.

2. Whilst DW supports infill development it needs to be properly managed with appropriate levels of allowable density to protect the amenity of both the new and the nearby

residents. Impacts include increased on-road car parking and traffic congestion on roads not designed for that level of density; increased noise and loss of privacy.

#### **4.1.4 Conclusion**

A definition of bedroom needs to be included in Schedule 1 of the Draft Plan to make clear that rooms that can be converted or adapted to be bedrooms are, for the purposes of the Planning Scheme, bedrooms. Such a definition will ensure that the density envisaged by the Draft Plan will be implemented.

## **4.2 Yandina Creek Quarry**

### **4.2.1 Desired Outcome**

The designation of Local and State extractive resource areas and the designation of McCords Rd as a transport route should be removed from the Draft Plan.

### **4.2.2 Background**

1. The Draft Plan Overlay Map OVM26G and OVM28G and 8.2.7 Extractive resources overlay code identify:
  - a. Local Resource/Processing Area in the vicinity of Zgrajewski RD and McCords Rd Yandina Creek;
  - b. State Key Resource Area and the State Key Resource Separation Area in the region of McCords and Yandina Creek-North Arm Roads; and
  - c. McCords Rd as a Transport Route and Transport Separation Area.
2. An application for a hard rock quarry located at 110 Zgrajewski Rd Yandina Creek (Lot RP165748) was refused by Council in 2005. The site was designated as Extractive Industry Resources in the applicable Strategic Plan and Extractive Resource Area by Regulatory Map 4.6 of the Maroochy Plan. During Council's determination of this application, Council resolved to remove both of these designations from the Maroochy Plan at the next Planning Scheme Review (i.e. Round 2 of 2006).<sup>18 19</sup>
3. In January 2003, the then Minister for Natural Resources and Mines advised Council that the subject site resource is not considered by the Department to be of State interest and that she would not object to its removal from the planning scheme if the subject application fails."<sup>20</sup>
4. Council's refusal decision was appealed in the Planning and Environment Court and dismissed by Judge Robinson in 19 October 2007. In refusing the application the judge recognised that the current encroaching residential development has compromised the ability of this resource to be won without unacceptable impacts on the environment and the amenity of the locality as it is today. Therefore this resource identified on the Draft Sunshine Coast Planning Scheme as a local resource/processing area has already been effectively sterilised from development due to these decisions.
5. An application to quarry hard rock in the McCords and Yandina Creek-North Arm Roads has been rejected by Council (26 October 2011) and the same proponent has appealed the Council's decision in the Planning and Environment Court. In its rejection of the

---

<sup>18</sup> Sunshine Coast Council Strategy & Planning Agenda 19 October 2011 Page 11

<sup>19</sup> Council Minutes dates March 2005

<sup>20</sup> <http://archive.sclqld.org.au/qjudgment/2007/QPEC07-086.pdf> page 10

development application Council resolved to “request the Chief Executive Officer to write to the State Government advising that the subject site’s current designation under the State Planning Policy 21/07 as a Key Resource Area be reconsidered”<sup>21</sup>

6. The extractive resources that McCords Rd (as a Transport Route and Transport Separation) is to serve have effectively been sterilised from development.

#### **4.2.3 Issues and Commentary**

1. These designations are no longer appropriate as development applications have failed and Council has committed to take action to remove these designations from the planning scheme.
2. These designations result in uncertainty for local residents and inhibit the development of the area.

#### **4.2.4 Conclusion**

The only way to provide certainty to this community, potential developers and to avoid unnecessary Planning and Environment Court costs to the ratepayers is to remove the State and Local Resource/Processing Areas and Separation Areas and Transport Routes from the Yandina Creek area.

### **4.3 Environment Protection**

#### **4.3.1 Desired Outcome**

The language related to protecting environmental interests is changed to ensure that, where avoidance of adverse impacts on the environment is not possible, the net outcome of the development has a positive impact on the environment for the Sunshine Coast.

#### **4.3.2 Background**

The relevant sections dealing with environmental protection in the draft plan, including the Strategic Framework, use the following language,

in 3.7 Natural Environment – Key Concept (4):

*Avoidance, or if avoidance is not practicable, mitigation of the individual and cumulative adverse impacts of development on the natural environment.*

and

commonly throughout the document:

“development avoids as far as practicable or *where avoidance is not practicable* minimises and otherwise mitigates, adverse impacts on ecologically important areas, including waterways, wetlands, coastal areas, habitats and vegetation through location, design, operation and management”

---

<sup>21</sup> SC Council Minutes 26 October 2011

[http://sunshinecoast.qld.gov.au/addfiles/documents/minutes/om\\_minutes\\_261011\\_signed.pdf](http://sunshinecoast.qld.gov.au/addfiles/documents/minutes/om_minutes_261011_signed.pdf)

### 4.3.3 Issues

We strongly support the environmental protections outlined in the Draft Plan. We are, however, concerned about the language used, in particular the words ‘*if avoidance is not practicable*’. This makes environmental interests subservient to the practicality of any other interests. This significantly erodes the Scheme’s ability to deliver on its vision.

By analogy the Scheme does not include the provision that ‘Road corridors are protected or where protection is not practical they are provided somewhere else’. Such a provision would significantly weaken Council’s ability to deliver its vision for an integrated transport network.

By the same token environmental protection that does not apply ‘if avoidance is not practical’ diminishes Council’s ability to deliver a connected network of conservation areas.

### 4.3.4 Recommendation:

We suggest the following alternative wording for this concept and recommend this change be made throughout the Draft Planning Scheme wherever this phrase occurs.:

*Avoidance of the individual and cumulative adverse impacts of development on the natural environment. Where avoidance is not reasonably possible the adverse impacts must be mitigated such that development proceeds in a way that has a positive impact on the natural environment at a regional scale.*

## 5 Strategic Framework

The Background and Context (Part 3A) (pages 4 – 42) provides useful information on the history of settlement on the Sunshine Coast as well as those key characteristics that define the Sunshine Coast of today.

While recognising that change is inevitable, the “sense of place” that is the Sunshine Coast is important and planning parameters should seek to manage growth by maintaining these desired characteristics.

Planning also needs to recognise the drivers of change and the identification of the key drivers (e.g. population growth, demographic changes, economic conditions, climate change, etc) is welcomed. These drivers of change are the most significant things that will impact on the region up to 2031.

Part 3A makes the valid point that the history of places is an important consideration in how we define communities today and how we plan for the future. This history recognises the coastal urban, rural town and rural village settings of these places which informs future planning for the Sunshine Coast. We strongly support the approach that an understanding of these places is the basis for the local planning approach adopted in the Strategic Framework, local plans and throughout the planning scheme. **We strongly urge that Council recognises our unique sense of place when determining appropriate development for the Sunshine Coast.**

The recent Sustainable Villages conference raised important issues concerning the appropriate form of development along the Sunshine Coast. Council is strongly urged to

consider the experience of communities around the world in planning for a sustainable future with strong community support.

We strongly endorse the community aspirations identified on page 26 and in particular that population growth should be managed. Rather than indicating that the “SEQ RP anticipates growth...”, the sentence should say, “the State Government requires Council to plan for growth ...”.

The last paragraph on page 26 should have the following sentence added ; “ Population growth should always be constrained by the carrying capacity of the region.”

We note the reference to the South East Queensland Regional Plan and its provision for a regional framework for managing growth, land use and development in South East Queensland. The sub-regional narrative for the Sunshine Coast identifies statutory growth management boundaries that define the geographic footprint of urban and rural residential development. We support Council’s efforts in ensuring that future development is contained within these parameters.

We believe that the local growth management strategies previously identified, remain valid and should continue to guide Council planning. Local growth management strategies concluded that growth on the Sunshine Coast to 2031 should primarily be accommodated in the following three ways:

- Within existing centres serviced by existing or planned infrastructure (Maroochydoore plus major regional activity centres)
- Key locations along strategic transport corridors (especially Kawana and Caloundra South)
- Major Greenfield development sites of Palmview and Caloundra South.

As a general principle, Development Watch supports the identification and protection of inter-urban breaks to prevent the likelihood of continuous ribbon development from Caloundra to Noosa. We believe urban growth through properly managed infill, in the areas identified in the Strategic Framework, is the preferred option.

Development Watch supports the Council’s Statement of Proposals for the new planning scheme 2009 that outlined the key directions for managing growth on the Sunshine Coast through the new planning scheme (as summarised on pages 39 and 40).

DW strongly objects to the inclusion, on P29, of any reference to Mr Palmer’s “new investment plans for the Palmer Resort”. Council staff have advised that this inclusion is based merely on media reports. Media reports should not be relied on in a planning scheme.

### **3.2 Strategic Intent**

Development Watch strongly endorses the sentiment that residents and visitors recognise and value the large green space as a dominant feature of the Sunshine Coast. While we recognise that development needs to take place to cater for the needs and aspirations of

current and future generations, we believe that future planning must recognise the premium placed on this feature.

We also recognise and support the notion that the Sunshine Coast is a “community of communities”. Future planning must recognise the diverse characteristic of the communities that make up the Sunshine Coast and that these communities are distinct and separate from each other, with each displaying an individual character and identity. We would hope that the application of the planning scheme encourages and fosters development that is unique and distinct from each of the other communities that comprise the region.

Development Watch remains concerned about the projected levels of population growth and the associated impacts on the region, particularly its liveability and its environment. We recognise that the Sunshine Coast will continue to grow. We acknowledge the intent of the planning scheme that seeks to ensure that new growth is appropriately located within well defined areas with the majority located in and around mixed use activity centres and within the emerging communities of Palmview, Kawana Waters and Caloundra South.

We strongly support , p37, that Caloundra South Extension Investigation Area be deleted from the Regional Plan and be maintained as described.

We endorse the identification of Maroochydore as a Principal Regional Activity Centre. We do not, however, agree with the categorisation of Coolum as a District Activity Centre. All references to Coolum as a district activity centre should be deleted from the Strategic Framework. Throughout the document there is reference to the roles of various levels of activity centres and their relationship to each other and the “community”. There is, however, no explanation of these concepts. See the major issues section of this submission for more detail on the issues supporting this conclusion.

We consider that the following wording, on p46, is too loose and should be amended to make clear that not all activities are appropriate to all activity centres.

*“In particular, the Sunshine Coast facilitates development and investment in activity centres and employment and enterprise opportunity areas which assists to entrench and enhance its reputation as an innovative hub for:-*

- *aviation industry segments;*
- *leading edge health services and medical research;*
- *contemporary education and training facilities;*
- *world class events that leverage off natural settings;*
- *high value professional services;*
- *niche, value-adding manufacturing; and*
- *sustainable rural enterprises that maintain and enhance agricultural land and other natural resources.”*

Similarly, the paragraph on p47 describing centres should be reworded to include words to the effect that activities appropriate to the scale of the centre are encouraged. Failure to make this change will result in disputes about what is permissible.

### **3.3 Settlement pattern and affordable living**

Development Watch endorses the key concept that urban and rural residential development is contained within defined local growth management boundaries.

We also support the concept of a compact, efficient and functional urban form in new and consolidated urban areas focussed around major regional activity centres and in Maroochydore, Palmview, Kawana and Caloundra South.

The concepts that the form and character of established residential neighbourhoods outside these areas be retained, is supported. We would ask that the word “most” in para (5) be deleted.

We strongly endorse the concept that the differences between, and individual qualities of, different urban places through local area planning responses, is recognised. However, we object to the terminology “local planning responses” as it is unclear. It would be clearer to replace this phrase with “relevant local plans”.

Development Watch endorses the strategic outcomes identified in 3.3.1 and, in particular, the objectives that growth is contained within defined boundaries and within specific areas. As a general principle, we favour urban infill over continuous ribbon development.

#### Element 1 – Character, lifestyle and environment

We strongly support the specific outcome that seeks to ensure that the built form avoids high rise buildings and undistinguishable tracts of urban sprawl and the maintenance of distinct, identifiable towns and neighbourhoods.

#### Element 2 – Growth management boundaries and land use categories

We strongly support the objective that urban development is limited within the urban growth management boundary. There should be no deviation from this principle.

#### Element 3 – A compact, efficient and functional urban form

The specific outcomes identified in Element 3 are supported, in particular that:

- The form and structure of new and consolidated urban areas contributes to the achievement of a more compact urban form. Urban infill is generally preferred over ribbon development.
- In existing urban areas, urban consolidation is focussed predominantly within existing or planned activity centres. We agree that this focus should be on Maroochydore, Caloundra, Nambour and Beerwah.
- Where urban consolidation occurs, it should be compatible and sympathetic to the preferred character of the local area.
- Existing established residential neighbourhoods that are not identified as defined areas for urban consolidation are retained generally in their current form. Owners are entitled to a degree of certainty regarding the housing choices they have made.

- Development contributes a fair and equitable share of the cost of providing infrastructure. Development Watch is particularly concerned that developments foisted upon ratepayers do not become a burden on rate payers. With an ageing population there is a danger that developments will become unsustainable in the longer term and the rateable base will be seriously compromised. Developers must not assume Sunshine Coast ratepayers will “bankroll” developments, particular those with no close association to ratepayers.

#### Element 4 – Affordable living

Development Watch generally supports the outcomes identified.

#### Element 5 – Activity centres as hubs of economic / community activity

Development Watch generally supports the specific outcomes. DW strongly objects to Coolum Beach being categorised as a District Activity Centre. See the major issues section of our submission. We note that District is not defined nor catchment areas for levels of activity centres.

#### Element 6 – Declared master planned areas and urban development areas

Development Watch generally supports the specific outcomes relating to declared master planned areas.

#### Element 7 – SEQ Regional Plan identified growth areas

DW strongly supports the specific outcomes to maintain and protect from land fragmentation and inappropriate land use activities in the Beerwah, Beerwah/Caloundra South Corridor and the Caloundra South (Halls Creek) identified growth areas.

#### Element 8 – Local settings and local planning responses

Development Watch strongly endorses the notion that The Sunshine Coast is a “community of communities” and supports any outcomes that maintain this concept. The character and identity of each community should be recognised and protected in accordance with a local plan. This should be one of the pre eminent principles that guides Council’s planning decisions.

### **3.4 Economic development**

Development Watch broadly endorses the key concepts relating to economic development except concept 4 relating to activity centres and a caveat re the Sunshine Coast Airport. Concept 4 is unclear. It is not apparent what a “network of activity centres” or “complementary roles and functions” actually means. The inclusion of the phrase “in line with the local plan” would assist and result in fewer disputes.

Our primary caveat regarding the Sunshine Coast Airport would be that investment attraction predicated on the expansion of the Sunshine Coast Airport should proceed with caution. Community concerns over noise levels, increase in aircraft movements, etc are of concern to the community and planning should not assume that development could proceed without some modification to assuage community concerns.

We also broadly support the strategic outcomes identified on page 68. We note that the planning scheme supports the encouragement of the traditional economic and employment activities of retail, construction and tourism. While it is to be hoped that these activities adapt to changing market conditions and consumer consumption behaviours, we caution on an over reliance on construction. Building activity is not the panacea to improved economic outcomes and we would strongly oppose a planning scheme that is “watered down” to allow for building activity that would otherwise not take place. There is only so much construction activity that can take place and once this is completed there is a vacuum in economic activity. It is often a false dawn as experience on the Sunshine Coast and elsewhere testifies.

We believe the Sunshine Coast would be well served by economic development strategies and policies that encourage the development of high level commercial activities particularly in the tertiary sector.

Development Watch supports the outcome that positions Maroochydore as the principal regional activity centre for the Sunshine Coast. We agree that a desired outcome is for Maroochydore to be supported by well designed and well connected regional activity centres at Caloundra, Nambour, Beerwah, Kawana, Sippy Downs, Noosa and Caloundra South. A focus on these areas obviates the need to attract significant, high level economic and employment activities in other centres such as Coolum. Appropriate transport connections to the above regional centres should provide economic activity and employment opportunities for residents outside these areas.

We object to the wording of Strategic Outcome (p) re other activity centres. It is unclear about the area that these are intended to service and should be amended to include the word “local” ahead of “communities” to make this clear.

We reiterate our earlier caveat concerning the Sunshine Coast Airport and support the outcome that it develops into a specialist activity centre provided development does not compromise resident values in those areas that could be impacted through future airport expansion.

DW strongly supports the inclusion of the phrase “conducive to their individual setting” in (v) regarding tourism.

#### Element 1 – Regional competitive advantage and key economic sectors

DW supports these outcomes and particularly welcomes the statements supporting the growth and maintenance of rural areas for rural activities and the protection of sport and recreation facilities.

## Element 2 – Activity centres network

DW strongly objects to the categorisation of Coolum Beach as a District Activity Centre and propose that it be a Local Activity Centre in line with the communities express wishes to remain a small coastal town with retail limited to local service. See major issues section of our submission.

Outcome (b) is unclear. The role and functions are not well described in Table 3.4A nor in any description of the activity centres network and in particular there is no explanation or definition of a district in Table 3.4A. This outcome would be significantly improved by a reference to the relevant local area plan.

Whilst DW broadly supports the other outcomes in this section, we are concerned that outcomes that discuss activity centres in the aggregate are unclear in intent given the wide variety in activity centres and what DW anticipates their scale of activity will encompass. This is exacerbated by the lack of clarity in the Strategic Framework, including in Table 3.4A, of the roles and functions of the various levels of activity centres and their proposed catchment areas and is particularly the case for District and Local Activity Centres. More references to the local area plans would assist as these do provide some opportunity to describe the intent for that location of their role and function.

We strongly support the outcome [outcome (c)] that developments that threaten or compromise the activity centres, either through activities outside of these centres or through larger scale development than that envisaged, do not occur. However, we reiterate that without adequate descriptions of their role, function and catchment areas a reference to local area plans would be useful in this outcome. With respect to Coolum, there are sufficient centre activity areas that can accommodate a mix of uses and a range of local shopping, without new areas being developed.

We believe the design outcomes of activity centres are highly appropriate [outcome (d)] and should be pursued.

The desired outcome of activity centres as the focal point for community life is strongly endorsed [outcome (e)]. The last thing we want are sterile “shopping areas” with no life after normal retail trading hours.

## Element 3 – Employment opportunity areas

The outcomes for the employment opportunity areas are broadly supported.

## Element 4 – Enterprise opportunity areas

Development Watch strongly objects to the classification of the Coolum Industrial Park as a “high impact” regional industry park as outlined in Table 3.4C. When the park was established it was intended to provide for local industry not regional industry. The limitations on industry imposed by the classification as high impact do not facilitate the growth of local low impact industry. The Yandina-Coolum Road is not designed for the traffic movement

associated with a high impact and regional site. High impact industry is not appropriately located in such close proximity to residential areas. The height of buildings and structures of up to 20 metres would interfere with the scenic amenity of people on the ridges in Coolum and Ninderry. It would also impact on the rural scenic outlook from the Sunshine Motorway. Our objections are elaborated in the major issues section of our submission. Refer also to our discussion on this topic at 3.2 above.

#### Element 5 – Tourism and tourism focus areas

Development Watch supports the outcomes identified for tourism. We particularly support the desired outcome that tourism focus areas provide for a range of visitor accommodation and tourist services with a particular emphasis on those uses compatible with existing tourism development [outcome (b)].

We also support the outcome that tourism activities are undertaken on a sustainable basis that protects and capitalises upon the natural values and key lifestyle attributes of the Sunshine Coast. These principles should be adhered and inappropriate tourism developments should not be approved that are not in keeping with these values [refer outcome (d)].

#### Element 6 – Primary industries and rural enterprise

Outcomes, particularly outcome (d) whereby rural areas are protected as a key element of the character, lifestyle and environment attributes that contribute to the Sunshine Coast's regional competitive advantage, are supported.

#### Element 7 – Home based business

Outcomes are supported.

### **3.5 Transport**

The key concepts and strategic outcomes are broadly supported with the exception of strategic outcome (h). We strongly object to parking requirements for Coolum being limited to that required by locals during non-peak periods. Whilst it is admirable to have the objective to reduce the reliance on cars, this cannot be achieved until there is an adequate public transport system with fares at a price that makes it an attractive option for both locals and visitors.

We are particularly supportive of strategic outcome (d) whereby the scale of transport corridors and the design of infrastructure is compatible with the preferred character of coastal urban, rural town and village, rural residential and rural communities and incorporates design features and elements that reduce impacts on amenity and opportunities for community interaction.

Other airfields are mentioned in this section a number of times, actual airfields or possible airfields should be identified and their actual or potential location mentioned to ensure that the community understands exactly what is planned.

Although a "Possible Future Aerodrome" is mentioned in the SFM2 map, it is not supported by any text in the entire document.

#### Element 1 - An integrated transport system

We generally support these specific outcomes and particularly welcome items (e) regarding the modified grid pattern for new developments and (g) regarding the requirements for high traffic uses.

#### Element 2 – Protection of environmental, landscape and character values

The specific outcomes are supported, in particular that transport corridors avoid those characteristics of transport systems in some larger metropolitan regions where extra wide carriageways and associated infrastructure (including acoustic walls and signage) dominate the landscape and communities.

While we support the development of a viable, integrated transport system, it is critical that transport corridors do not themselves form an unacceptable blot on the landscape or on communities they serve.

#### Element 6 – Parking areas and facilities

We strongly endorse specific outcome (b) whereby car parking areas are located under buildings, in basements, enclosed within a building, sleeved or otherwise hidden from view so as to not be dominant in the streetscape.

While the provision of adequate parking for residents and visitors is recognised as part of a holistic approach to transport needs, it is nevertheless the case that the urban landscape can be seriously compromised by vast tracts of parking areas. Council is to be commended for developing strategies to minimise the visual impact of parking and developers need to accept that adequate parking and appropriate parking solutions need to be an integral component of any development application.

Members of Development Watch are only too familiar with situations in other parts of Australia where large scale residential developments have been constructed without due consideration to providing adequate parking facilities. This has resulted in “two or three car families” parking on streets, verges and common areas. This should be avoided on the Sunshine Coast. However, as outlined above adequate parking facilities should be required to be provided and this should provide for sufficient local and visitor parking at peak times.

The phrase in 3.5.7.1 “car parking areas are safe and legible” should be rephrased and a word in common useage should replace the word legible as the meaning of this word in this context is unclear.

#### Element 7 – Freight movement

With reference to specific outcome (c) we agree that large scale industrial uses or other heavy traffic generating activities are located proximate to an identified freight route.

Development Watch also strongly urges Council to be mindful when approving major developments of the scale, frequency and intensity of construction traffic through and on residential traffic corridors. Developers should identify traffic routes that obviate the necessity of travelling through residential corridors, tourist zones and the like. The recent experience of the unacceptable level of construction traffic associated with a residential development just south of Coolumb is a case in point.

### **3.6 Infrastructure and services**

The key concepts outlined on page 87 are supported as are the strategic outcomes on page 88-89.

#### Element 1 – Integrated and sustainable infrastructure provision

Development Watch strongly supports the statement that Development (Developers) should contribute a fair and equitable share of the cost of providing infrastructure in accordance with the priority infrastructure plan [refer point (c)]. Ratepayers should not be expected to be burdened with the costs of providing infrastructure particularly in the case of large urban redevelopments far removed from a community's catchment area. The State Government should not impose large scale developments on the Sunshine Coast community and, when they do, it should be on the basis that the State meets appropriate infrastructure costs.

#### Element 8 – Open space infrastructure

Development Watch generally supports the specific outcomes for open space infrastructure and particularly supports outcome (a) for fair and equitable access to sport and recreation facilities.

DW also strongly supports an outcome that open space and sport and recreation facilities are protected from encroachment by incompatible land uses [refer point (c)]. As mentioned elsewhere in this submission, we are strongly of the view that open space and sport and recreation facilities are protected. There is adequate land available for urban development, certainly for the life of the current plan, that obviates the need for scarce recreational space to be compromised. We strongly urge Council to take steps to protect these areas when considering development applications.

#### 3.6.8 Element 7 – Waste Management Infrastructure

DW supports specific outcomes (a) to (e) and encourages Council to be more proactive in progressing its adopted Regional Waste Minimisation Strategy

### **3.7 Natural environment**

The key concepts outlined on page 95 are supported. While we broadly support the strategic outcomes and the elements that support the natural environment theme we have not made detailed comments as we understand these will be addressed in greater detail by other organisations such as the Sunshine Coast Environment Council.

#### Element 1 – Natural habitats and biodiversity

With respect to specific outcomes (a) and (b) we believe the wording is too loose and open to abuse. Avoiding development “as far as practicable” does not provide sufficient protection to ecologically important areas.

Point (b) (i) does not provide sufficient protection to ecologically important areas. The caveat that ecologically important areas are not disturbed by development “unless on the balance of social, economic and environmental benefits, it is demonstrated that the development is in the interests of the community” is not strong enough and provides developers with too much “wriggle room”. If Council is serious about protecting natural habitats and biodiversity it needs to determine that certain areas are out of bounds. Ecologically important areas are such areas.

#### Element 2 – Koala's and koala habitat areas

Just as there is a need to protect ecologically important areas, it is imperative to protect diminishing koala habitat areas.

Therefore 3.7.3.1 (a) is not supported to the extent that conservation or 'no go' provisions should be applied to these areas.

### **3.8 Landscape character, community identity and inclusion**

Development Watch endorses the key concepts in this theme. In particular we strongly support the following key concepts:

- 1) Recognises the Sunshine Coast as a special place with a unique identity and lifestyle. Planning approvals should ensure that this uniqueness prevails.
- 2) Maintains the Sunshine Coast as a place that is distinct from, and separate to, other parts of metropolitan South east Queensland. The Coolool community and other communities of the Sunshine Coast consistently state their opposition to the region becoming “another Gold Coast”. Planning assessments need to recognise that the community places a very high premium on the unique character that is the Sunshine Coast and that this uniqueness is to be preserved.
- 4) Urban environments are generally less intensive when compared with other metropolitan areas in South East Queensland (further gradation in intensity between Maroochy and Caloundra South). See comments above.

7) Built form and landscaping is locally responsive. It is important that the planning approval process recognises that the “look” of buildings is as important as the adherence to specific code requirements.

10) Meeting places, community facilities and open space, sport and recreation opportunities are available for all communities. While a large percentage of the Sunshine Coast remains undeveloped there is a shortage of open space suitable for sport and recreation. The preservation of recreational open space is important and contributes to the lifeblood of local communities. Recreational open space should not be sacrificed for urban development.

The strategic outcomes for the landscape character, community identity and social inclusion theme are supported. In particular the outcome that the Sunshine Coast remains the distinct and separate to other parts of South East Queensland is supported [refer point (b)]. The provision of inter-urban breaks is strongly encouraged. The urban break between Coolum and Peregian must be maintained and we recommend that the planning scheme incorporate a specific urban break between Mudjimba and the Maroochy River.

We strongly endorse the proposed outcome that urban areas north of the Maroochy River are characterised by a less intensive scale and form of urban development [refer point (e)]. We are concerned however that this outcome is poorly worded. It could be misinterpreted to mean that all the coastal urban areas north of the Maroochy River are NOT characterised by a less intensive scale and form of urban development and request that the wording be appropriately changed to ensure the intent to protect these coastal urban areas is clear.

We endorse the outcome that in 2031 the Sunshine Coast is still a community of communities [refer point (f)].

We endorse the outcome that the community is provided with open space, sport and recreation opportunities that promote social inclusion and healthy living [refer point (j)]. There is considerable evidence that the provision of recreational facilities contributes to social cohesion and helps prevent social problems and anti-social behaviour in communities.

#### Element 1 – Landscape elements and features

Outcomes are supported and, in particular, that coastal urban and rural town and village communities remain distinct and separate from one another [refer point (c)]. Many residents have chosen to live in specific coastal, rural town and village communities for the character and distinctiveness that they offer. Many who have migrated to these localities are prepared to forego higher order facilities in favour of the different character of the place of residence chosen.

DW is strongly of the view that in order to achieve these outcomes the maps showing the regional and sub-regional breaks need to be much more accurate as in their current form they are subject to misinterpretation.

DW objects to the failure to include key landscape elements and features of the Coolum area in Table 3.8A. These elements include Eunungunder Hill, Point Arkwright and Point

Perry. If the intention is to only highlight the really major landscape elements and features of the Sunshine Coast in the table this should be made clear and there should be a reference to further elements and features as identified in local area plans and in overlays. This would make protection of these elements and features clearer and ensure that they are identified in the Strategic Framework in case of dispute

We strongly endorse the inclusion of the parabolic sand dunes in Table 3.8A and suggest that lookouts be added to the table.

#### Element 2 – Built form character and sub-tropical design

Development Watch strongly supports the specific outcomes identified under element 2. Planning decisions should be made that:

- Protects and enhances the Sunshine Coast's image as a distinct place with a predominantly low intensity built environment [refer point (a)]. We believe large warehouse style constructions that have no aesthetic value (e.g. large “box” like structures) should not be approved in communities where such structures are out of character.
- Ensures the height of buildings reflects and preserves the preferred character and identity of individual communities. Opposition to “high rise” is probably the single most emotive issue within individual communities when it comes to planning decisions. We strongly support the recognition that regulating building height is a critical development parameter that offers the community certainty and that this should not be compromised [refer point (b)].
- Provides for a high standard of urban design and landscaping [refer point (c)].

#### Element 4 – Community hubs

Whilst DW agrees broadly with the outcome outlined in (a), as outlined earlier we have significant concerns that the community or communities that serve as the catchment for activity centres are undefined.

#### Element 5 and 6 outcomes are supported.

#### Element 7 – Open space and sport and recreation facilities

We endorse the specific outcome that open space and sport and recreation facilities are well located and designed to encourage healthy, active living and which support the outdoor lifestyle enjoyed by residents and visitors to the Sunshine Coast [refer points (a) and (b)].

However, we consider that the outcomes should repeat the fair and equitable access to open space and sport and recreational facilities and that there will be no encroachment on these by inappropriate land use or development.

### **3.8.9 – Strategic Framework Maps**

DW urges Council to improve SFM6 to make much clearer and more accurate the sub-regional urban breaks so as to avoid disputes in future. Also SFM6 does not include all the landscape elements and features for Coolum. Whilst there is a reference to overlays this reference should be elaborated to make clear that these form part of the strategic framework. There should also be a reference to elements and features outlined in local area plans to ensure that there can be no confusion and all elements and features that make the Sunshine Coast such an interesting and worthwhile place to live and visit are included. This is critical given the status of the Strategic Framework should there be any conflict.

### **3.9 Natural resources**

The key concepts are broadly supported, particularly the recognition that some renewable and non-renewable natural resources may not be suitable for exploitation due to their location and their potential to create land use conflicts (refer point 4) and 3.9.1 (c).

DW strongly supports the protection of agricultural land as outlined in 3.9.1 and particularly (b) protecting the landscape character and scenic amenity. However, DW does not support point (d) which allows development unrelated to rural enterprise on rural land. This point should be reworded to simply state that development unrelated to rural enterprise on rural land is not permitted.

#### Element 2 – Forestry

3.9.3.1 - Specific outcomes (b) (c) and (d) are questionable given that some native forestry harvesting undertaken in the Sunshine Coast region contributes to biodiversity loss through impacts on locally significant ecosystems. While native forestry activity comes largely under often poorly regulated state government legislation, Council powers need to be strengthened to ensure the region's biodiversity is not further eroded through this practice.

### **3.10 Natural hazards**

The key concepts are supported, in particular, acknowledgement that flooding is particularly relevant to the Sunshine Coast (2) and that the pattern of settlement should be reshaped to avoid new development in areas subject to critical natural hazards such as flooding (6). DW also supports the need to adapt over time to natural hazards where development has occurred or been approved.

Development Watch has been concerned that some developments have been approved in recent years over land identified as prone to flooding and in contravention of the findings of recent studies such as the Queensland Flood Commission. We strongly urge Council to take a precautionary and conservative approach when assessing development applications over such areas.

We support strategic outcomes that ensure resilience to natural hazards (such as flooding), identify areas likely to be at risk from natural hazards (particularly as a result of climate change), and shape patterns of settlement (to avoid risks of flooding, coastal erosion).

#### Element 1 – Flooding

Development Watch endorses the specific outcomes as identified in 3.10.2.1 (on page 117).

We are particularly concerned [refer outcome (c)] that urban and rural development is not located on land subject to flooding and that development only be permitted in circumstances where the effects of flooding can be mitigated at a very high level. The exceptions identified in section (c) subsections (i) to (v) are not acceptable and should be removed from the planning scheme or stricter caveats applied.

We do, however, strongly support outcome (d) whereby community uses and other activities requiring a high level of immunity from natural hazards are not located on land that is subject to flooding. In particular, we ask that the outcome be strengthened to ensure aged care facilities and retirement villages can continue to function during a maximum flood event.

## 6 Overlays and Overlay Codes

It is expected that the lack of detail on many of the overlay maps will result in an increase in the number of disputes that have to be resolved by council.

### 6.1 Heights of Buildings and Structures Overlay Map (OVM30I)

#### 6.1.1 Coolum Industrial Park

The high impact industrial zone has been allocated a height limit of 20 metres across the zone. DW's concerns about the categorisation of this industrial park are dealt with in the major issues section of the submission. While it is generally agreed that the structures in an industrial park should have a greater height than the surrounding buildings, 20 metres is too high for this industrial park.

##### 6.1.1.1 Background

6. MP2000 classifies Coolum Town Centre as a "Village Centre" and at 3.11.3 states:

*This will be a small scale Village Centre, accommodating a mix of boutique retail, business and community facilities. Within this Planning Area, the scale of retail and commercial activities will be limited to serving the immediate catchment area of Coolum and will not serve a district or higher order function.*

7. In the consultation process leading to the development of the Draft Plan, Coolum residents were the most active, raising the most flags and making the most submissions. They expressed strong views about the nature of the town including:

- a. *Keep small town, village, sea-side feel*
- b. *Keep population the same, no over population, keep sustainable*
- c. *Limited low key, low impact, low rise development*
- d. *Density levels should be strictly adhered to, keep lower density, stop extra bedrooms, (eg media rooms/offices)*
- e. *No high rise, low rise/scale, 2 storeys residential areas, 3 storey limit mixed use*
- f. *Don't build too many commercial buildings*
- g. *Protect foreshore from commercial/residential development*
- h. *Attract small, interesting local businesses (i.e. not multi-nationals or chain stores).*

8. In the Draft Plan, Coolum Local Plan Code (7.2.9.3) states:

- a. *“Urban development is limited..... so as to protect and reinforce the small coastal village character and identity of Coolum.....”*
- b. *“No new large floor plate retail uses are intended to be established in the Coolum Beach Town Centre”;*
- c. *“Development in Coolum Town Centre contributes to low-scale, compact coastal town with an intimate village character.....”*
- d. *“...low key coastal urban community with a strong focus on tourism.....”;*
- e. *Development....reinforces the frontage to Coolum Esplanade as the tourism focus area....”;*

#### **6.1.1.2 Issues and Commentary**

Coolum residents have made their strong views about retaining Coolum as a small village well known. While comments on the Draft Plan during the 2010 community consultation process were not directed towards the height limit of the industrial zone, that was partly because the industrial area was not at that stage, part of the Coolum Local Plan Code. The sentiments expressed during the consultation process can be applied equally to the industrial park.

#### **6.1.1.3 Conclusion**

In other sections of this submission, changes have been requested for the Coolum Local Plan Code to limit the height of the buildings in the Coolum Industrial Park. Rather than having to go to multiple places in the plan to understand the height restrictions in the Coolum Industrial Park, it would be beneficial to annotate OVM30I (Height of Buildings and Structures Overlay Map).

#### **6.1.2 Town Of Seaside**

From the information on the Height Overlay, it is difficult to pinpoint the 25 metre height limit in the Town Of Seaside. From our understanding, the height limit specified in the Master Plan is not in the order of 25 metres. It should definitely be redrawn at a lower limit, based on the Master Plan, at 16 metres.

#### **6.1.3 Coolum Beach – Scrub Road and Pacific Terrace**

The buildings on the corner of Scrub Road and Pacific Terrace are not in the Tourist Accommodation Zone (as per Zone Map ZM 30) and yet the Height Overlay includes them in a 12 metre zone. The Height Overlay should be redrawn to show a height limit on this corner block of 8.5 metres only. This is in line with the previous height limit specified in Maroochy Plan 2000.

#### **6.1.4 Mt Coolum**

There are 2 areas on the corner of Suncoast Beach Drive and David Low Way which have previously been allocated a height limit of 12 metres. Construction of buildings to this limit would interfere with the visual amenity associated with one of the Sunshine Coast's unique natural assets, Mt Coolum. As can be seen in the bellow picture of Mt Coolum, the present height of the buildings on that corner is more appropriate for the visual amenity of the area. It should be noted that this stretch is considered a gateway to the Coolum Local Plan Area and thus would be enhanced by a lower height limit. It is one of the views mentioned in the Scenic Overlay Significant Views Table 8.2.13.3.2



## 6.2 Airport Environs Overlay Code (8.2.2)

The “Criteria for assessable development” table<sup>22</sup> lists A01.4 as an acceptable outcome for the Performance Outcome (P01) which states “Development does not cause an obstruction or hazard to the safe movement of aircraft within an airport’s operational airspace.....” A01.4 warns that “uses involving the bulk handling or disposal of putrescible waste (e.g. landfill and waste transfer facilities) are not located within the 13 kilometre airport runway separation distance contour, as identified on an Airport Environs Overlay Map.”

While this ‘Acceptable Outcome’ seems very specific in nature, this proviso must be kept in mind if there is any chance that the Coolum Industrial Park becomes a high impact industrial park. Many of the consistent uses associated with a high impact industrial park must certainly be just as dangerous as those listed in A01.4. The Coolum Industrial Park is within the 13 km radius as shown in the Airport Environs Overlay Map (OVMBSCA(i)).

## 6.3 Coastal protection overlay code (8.2.6)

Set backs (building set backs) are defined in relation either to the coastal building line or to adjacent properties. DW believes this is a flawed approach to ‘protecting people and property from coastal hazards’. Only a few areas on the coast have an identified coastal building line and many existing properties are unacceptably close to erosion prone areas.

No new lots should be created in the coastal protection area. Any development on existing lots should be code assessable. Setbacks should not be defined in relation to existing properties or an arbitrary 6 metres from the seaward boundary. They should be determined with reference to the coastal features.

<sup>22</sup> Draft Sunshine Coast Planning Scheme 2012, 8 Overlays, Table 8.2.2.3.1 Criteria for assessable development p8-5

## 6.4 Biodiversity, Waterways and Wetlands Overlay Map (OVM30C(ii))

One of the natural features listed in the Strategic Framework, the parabolic dune, is listed on this overlay as a waterway. It is not a waterway. Also, the riparian area should be continued along the waterway west of David Low Way between Suncoast Beach Drive and Tanah Street West. The eastern bank of this waterway is heavily vegetated.

## 7 Coolum Local Plan Area

### 7.1 General Comments on Coolum Local Plan Code

Coolum Local Plan Code, if read in conjunction with applicable sections of the Draft Sunshine Coast Planning Scheme 2012, maps closely to the intent of Maroochy Plan 2000. DW has three major issues with the Coolum Plan Code. These are:

- categorisation of Coolum and the Coolum Town Centre as a District Activity Centre and District Centre Zone respectively, rather than as a Local (Full Service) Activity Centre and Local Centre Code;
- categorisation of Coolum Industrial Park as a Regional and High Impact Industrial Park rather than as a local or sub-regional low impact industrial park; and
- the zoning and characterisation of the Palmer Tourist Resort.

These major concerns are dealt with in the Major Issues section of this submission, but will be referred to throughout this section on the Coolum Local Plan Code.

### 7.2 Specific Comments – Coolum Local Plan Code

#### 7.2.1 Comments on ‘7.2.9.2 - Context and Setting’

While this section contains extrinsic material only, it is this section which creates a general sense of the area bound by the Coolum Local Plan Code, especially for the layman.

**General Comment** – The Statement of Desired Character for Planning Areas and Precincts<sup>23</sup> refers to many natural assets that are no longer mentioned in the Draft Planning Scheme Local Plan Codes. For example, Coolum Environmental Park, the remnant vegetation mosaic in Point Arkwright, the Grandview Heights Bushland Park, Birrahl Park, a species of orchid specific to Mt Coolum (*Bertya sharpeana*), to name a few. These may now be protected by inclusion in Environment Management and Conservation Zones. Stumers Creek deserves more than a passing mention, but the lack of detail on this waterway may be due to its current exclusion from the Coolum Local Plan Area. Please amend the extrinsic material to refer to Emu Mountain (as opposed to Mt. Emu).

**Town of Seaside** - Town of Seaside is included in the Coolum Local Plan Code in the Draft Sunshine Coast Planning Scheme 2012. This suburb is part of Marcoola, as shown by street signs, postal addresses and postcodes. It is difficult to understand why it does not reside more comfortably with the rest of Marcoola in the Maroochy North Shore Local Plan Code.

**Palmer Coolum Resort** – The description refers to ‘significant tourist attractions such as Coolum Palmer Resort’. To highlight the unique character of the Coolum Local Plan, it would be more appropriate to refer to significant tourist attractions such as the recently

<sup>23</sup> Maroochy Plan 2000, 3 Statement of Desired Character for Planning Areas and Precincts p199 +

renovated Mt Coolum walk or the pristine beaches in close proximity to the Coolum Beach Town Centre. If the Palmer Coolum Resort must be mentioned, perhaps it would be better categorised as a ‘renowned tourist resort’, rather than a tourist attraction in its own right. Perhaps the only mention that needs to be made of this resort is further down the section along with other ‘sport and recreational areas’.

**Coolum Industrial Park** – The Coolum Industrial Park is referred to as a significant industry and enterprise opportunity for the region. For a number of reasons detailed more thoroughly in the Major Issues section, the designation as an industry and enterprise opportunity for the ‘region’ is inappropriate. Development Watch believe it should more correctly be designated as a ‘sub-regional’ industry and enterprise opportunity.

**Coolum Beach Town Centre** – The commentary states that the Coolum Beach Town Centre is intended to function as a District Activity Centre. Of all the definitions provided in the Draft Sunshine Coast Planning Scheme 2012, it is apparent that Coolum Beach Town Centre functions more correctly as a Local (Full Service) Activity Centre (refer to the Major Issues section in our submission for more discussion on this issue).

## 7.2.2 Comments on ‘7.2.9.3 Purpose and Overall Outcomes’

**Low key coastal urban community** - We strongly agree with the sentiments expressed in paragraph (2) (a) which refer to the Coolum Local Plan area as a low key coastal urban community. As per this paragraph, Coolum does have a strong focus on tourism. However, to align with the current and future direction for Coolum, the paragraph should dictate that Coolum is serviced by a range of small scale (not small-medium scale) business, community, sport and recreational activities. This change reflects the clear intent expressed in 7.2.9.2 – Context and Setting of the plan which refers to Coolum “providing a focus for small scale retail, commercial, residential and community activities which maintain the coastal village character of the local plan area”, a statement we strongly agree with.

**Coolum Beach Town Centre – paragraph (c)** – There are a number of requested changes to this paragraph, so the paragraph is repeated below (requested changes italicized). The changes are to support the very strong preference for Coolum to be seen as a local activity centre as opposed to a district activity centre and for the Coolum Beach Town Centre to be seen as a local centre zone. The proposed changes are also intended to support the comment referred to above, that Coolum only provides small scale activities and that the area to be serviced is the local plan area.

Paragraph (c) should read, “Centre activities are consolidated within the Coolum Beach Town Centre in the east of the local plan area and generally bounded by Margaret Street, David Low Way (also known as Coolum Esplanade), Elizabeth Street and Sunrise Avenue. The Coolum Beach Town Centre functions as a *local activity centre* providing a range of commercial, retail, community and residential uses to service the needs of residents *in* and visitors to the Coolum *Local Plan* area. Mixed uses and uses which enhance the beachside character and *local activity centre role* and function of the Coolum Beach Town Centre are encouraged. Retail and commercial development does not extend beyond the boundaries of the *local centre zones* and Tourist accommodation zone. No new large floor plate retail, *business or entertainment uses* are intended to be established in Coolum Beach. *Residents continue to rely upon Maroochydore, Nambour, and Noosa to fulfil their higher order business and retail needs. Development in Coolum Town Centre does not detract from the role and function of these nearby major activity centres.*”

All references in the draft Sunshine Coast Planning Scheme to Coolum as a *District Activity Centre* and to Coolum Town Centre as a *District Centre Zone* should be changed to reflect Coolum as a *Local (full service) Activity Centre* and Coolum Town Centre as a *Local Centre Zone*.

#### **Rural Zone – West of Barns Lane and South Coolum Rd (Paragraph (g))**

DW strongly supports the zoning of the land to the west of Barns Lane and South Coolum Road as rural as outlined in paragraph (g). Coolum residents have previously vigorously rejected proposals for urban development, residential or business/commercial development, on the land between Barns Lane and the Motorway as totally inappropriate for the western gateway to Coolum. Such development is also not consistent with the Scenic Amenity Overlay for Coolum.

Similarly Coolum residents have shown over an extended period their very strong support for no urban development on the land west of South Coolum Rd including the land to the west of the Motorway.

#### **High Impact Industry Zone (Paragraph (h))**

DW strongly objects to the Coolum Industrial Park being categorised as High Impact and as a regional industrial park. Our arguments are outlined in the Major Issues section of our submission.

All references in the Planning Scheme, including in the Coolum Local Plan Code, to this categorisation should be replaced with Low Impact and sub regional Industrial Park.

Paragraph (h) in 7.2.9.3 should be rewritten to read as follows:

(h) Development in the Low Impact Industry zone, to the west of Coolum Beach, provides for a diverse mix of low impact industrial uses set within an integrated, modern and visually appealing industry park with a high level of environmental performance and is designed to service Coolum and the immediately surrounding locations. The industry park is protected from incompatible development that may adversely affect operations and does not allow for any adverse affects on adjoining environment areas.

#### **Coolum Tourist Park (Paragraph (i))**

DW strongly supports the retention of the tourist park at Coolum for the reasons outlined in paragraph (i).

#### **Palmer Coolum Resort (Paragraph (j))**

DW supports the statements made in paragraph (j). In particular, Development Watch supports the last sentence that “Development respects the small scale and low-key character of the surrounding areas.”

#### **Strong support – Paragraphs b,d,e, l and m.**

DW strongly support the principles defined in paragraphs b, d, e, l and m. These paragraphs all reinforce the need for Coolum to retain its coastal village character, maintain its low-scale, compact development, protect its environmental values and value its open spaces.

### **7.2.3 Comments on 7.2.9.4 – Assessment Criteria**

**Structure of Table 7.2.9.4.1 – Criteria for assessable development** - The structure of this table lends itself to misinterpretation. It is not clear that adherence to one or more of the “Acceptable Outcomes” means compliance with a Performance Criterion has been achieved. Council should review each of the Performance Criteria against the Acceptable Outcomes to evaluate that adhering to the Acceptable Outcome(s) will, in fact, result in the meeting the Performance Criteria.

### 7.2.3.1 Development in the Coolum Local Plan Area Generally (All Zones)

#### Performance Outcome - P02

The description contained in this criterion seems to refer to the northern and southern gateways / entry points on Coolum Local Plan Elements (Figure 7.2.9A). The criterion should be expanded (or another added), to specify that the western gateway / entry point is to retain its rural characteristics and continue to provide a natural landscape gateway to Coolum. This complements the statement in 7.2.9.3 Paragraph (2) (g) which recognises that the “land west of Barns Lane and South Coolum Road is retained in the Rural Zone providing a natural landscape gateway to Coolum.” We have previously indicated that we strongly support this statement.

It is our view that, as part of enhancing the western gateway to Coolum, Council should move its depot on South Coolum Road to the Industrial Park and make that land and the adjoining land to the roundabout a park or green space. Council should also ban this space becoming (or continuing to be) a car park for large vehicles, a use which does not contribute to the attraction of the western gateway.

#### Performance Outcome - P03

It is considered that this criterion is key to the retention of the character of Coolum and this statement is fully supported.

#### Acceptable Outcome – A03.1

The wording should be changed to include views not only ‘to’ the features listed but from these features as well. Lows Lookout should be included in the list of features which offer scenic amenity. The list of features should include those identified on Figure 7.2.9A – Coolum Local Plan Elements i.e A03.1 will read “Development protects and emphasises and does not intrude upon the important sightlines and views to and from Coolum Beach, Mount Coolum, Emu Mountain, Eurungunder Hill, Point Arkwright, Point Perry and Lows Lookout and include features identified in Figure 7.2.9A – Coolum Local Plan Elements and the Scenic Amenity Overlay Map (OVM30M).” Views along David Low Way and the Sunshine Coast Motorway, as identified in the Scenic Amenity Overlay Map (OVM30M), should also be included in this list.

#### Acceptable Outcome – A03.2

Protection of mature and ‘character’ vegetation is strongly supported.

### 7.2.3.2 Development in Local Centre Zone (Coolum Beach Town Centre) (Formally District Centre Zone)

As mentioned previously, the Coolum Beach Town Centre should be classified as a Local Centre Zone. This discussion can be found in the section on Major Issues. All comments in the ‘Development in District Centre Zone’ should be translated and transferred to a new section - ‘Development in Local Centre Zone (Coolum Beach Town Centre)’.

#### Performance Outcome – P05

P05 should now read – “Development in the local centre zone provides for small scale uses and mixed uses that:-

- a) Support the role and function of the Coolum Beach Town Centre as a local (Full Service) activity centre;
- b) Provide a range of goods and services to residents and visitors to meet their immediate needs; and
- c) Does not detract from the role and function of nearby major activity centres.

#### Performance Outcome – P06

The requested change is to the leading statement which should read ‘Development in the *local* centre zone ..... etc instead of ‘Development in the district centre zone’.

Also, an addition should be made to (b) such that it refers to ‘providing a range of commercial and retail uses which cater to the immediate needs of the residents of and visitors to the Coolum Local Plan area.’

#### **Performance Outcome – P07**

Change the leading statement to read ‘Development in the *local* centre zone ..... etc and add an extra provision “(e) is consistent with the Coolum Village Centre Landscape Master Plan. There was considerable consultation with the Coolum community on this Master Plan and it was accepted by Council some years ago. Council’s website indicates that “*The plan provides a framework for the detailed design and construction of the master plan vision as funding becomes available while providing guidance for future council and private developments to be consistent with the Coolum community’s placemaking vision.*”<sup>24</sup>”

#### **Acceptable Outcomes – A07**

The leading statement should read ‘Development in the *Local* Centre Zone’ and paragraph (a) should be deleted as it not consistent with PO11 nor with ‘7.2.9.3 – Purpose and Overall Outcomes’.

An additional provision should be made – (h) is consistent with the Coolum Village Centre Landscape Master Plan.

#### **Performance Outcome (P09) and Acceptable Outcome (A09) – Delete these Outcomes**

These outcomes are to be deleted as they are NOT consistent with either PO11 or with ‘7.2.9.3 – Purpose and Overall Outcomes’.

#### **Performance Outcome - P011**

To conform to the overall outcome described for Coolum in 7.2.9.3 “ ... protect and reinforce the small scale coastal village character and identity of Coolum ...”, P011 is to be modified to “Development does not provide for the establishment of any additional *medium* or large floor plate retail or *other business* uses.

### **7.2.3.3 Development in Local Centre Zone (Coolum West)**

#### **Performance Outcome - P014**

Paragraph (b) should be deleted as the Coolum Beach Town Centre and the Coolum West Local Centre both function as Local Centre Zones.

#### **New Performance Outcome for Local Centre Zone (Coolum West)**

This zone should also have the proviso that ““Development does not provide for the establishment of any additional *medium* or large floor plate retail or *other business* uses.”

### **7.2.3.4 Development in the Emerging Community Zone**

Development Watch considers that the categorisation of the Palmer Coolum Resort as an Emerging Community Zone is totally inappropriate as that zone description refers only to residential development, not to any tourist facility. See the Major Issues section of the submission on the Palmer Coolum Resort.

Otherwise DW endorses the Performance Outcome PO15. However, Development Watch strongly objects to the Acceptable Outcome AO15. The AO should make clear that future development is in line with the Master Plan – it is not sufficient to have an Editors Note that has no force in law.

<sup>24</sup> See <http://www.sunshinecoast.qld.gov.au/sitePage.cfm?code=coolum-master-plan>.

### **7.2.3.5 Development in Precinct COL LPP-1**

This Master Planned Development is part of Marcoola and should be moved to the Maroochy North Shore Local Plan which includes the majority of Marcoola. Also see comments below (7.3).

### **7.2.3.6 Development in High Impact Industry Zone**

Development Watch argues strongly that this should not be a high impact industry zone. Refer to major issues section of this submission.

Irrespective of the decision, a **new Performance Outcome** needs to be added to the Coolum Local Plan Code for development in the industrial zone. For development in such a sensitive area, it is assumed that council would impose 'best practice' standards on the development. The height overlay is to be amended to 12 metres (maximum for structures) with restrictions on the building height to 8.5 metres. Structures should not be clustered so as not to interfere with the visual amenity of the area. Lower height limits should be imposed along scenic routes (Sunshine Coast Motorway and Yandina – Coolum Road).

### **7.2.3.7 Development in the Rural Zone (Barns Lane)**

This zone should be used only for rural land uses, especially those which enhance the Coolum gateway. This performance criterion and Acceptable Outcome are strongly supported.

## **7.3 Coolum Local Plan Elements Figure 7.2.9A**

Significant views should be shown to both east and west of the 'Mountains or Hills' shown on the map.

## **7.4 Coolum Local Plan Precincts - LMP30**

It should be noted that Map LMP30 (Coolum Local Plan Precincts) refers to precinct COL LPP1 (Town Of Seaside). Development Watch considers that this Precinct Map is also incorrect as it includes Boardwalk Estate (Stocklands) and part of the original Mt Coolum suburb.

## **7.5 Coolum Local Plan Area – Zone Map ZM30**

### **7.5.1 Sport and Recreation Zone**

The area adjacent to the sewage treatment works on West Coolum Road and designated as Sport and Recreation Zone is not fit for purpose and should be rezoned. The land is subject to flooding and inundation (according to the Flood Hazard Overlay Map - OVM30H). It is also isolated from any residential area and public transport.

### **7.5.2 Coastal Fringe**

The coastal fringe from the Tourist Park (southern boundary) to the Stumer's Creek (northern boundary) should be included in the Coolum Local Plan Area so that the Lions Park can be correctly recognised as Community Facilities Zone – 4 Community Use.

### **7.5.3 Emerging Community Zone**

There is a section of rainforest within the Palmer Resort which was protected as part of the Pt Arkwright Mosaic and also in the MCU05/0245 Infrastructure Agreement. This is not noted on any maps in the Planning Scheme. Please amend this map (ZM30) and other relevant maps to show this Environmental Management and Conservation Zone area.

## **8 Zone Codes**

Part 6 of the Draft Sunshine Coast Planning Scheme contains the zone codes for the 22 zones covering residential, centre, industry, open space and other zones. This submission restricts comments (where applicable) to those zones within the Coolum Local Plan Area.

Development Watch broadly endorses the zoning that is applicable in the Coolum Local Plan Area with the exception of the District Centre Zone; the High Impact Industry Zone; and the Emerging Community Zone. Our concerns are highlighted in the earlier section of our submission under “Major issues”.

### **8.1 Residential Zones Category**

6.2.1 Low Density Residential Zone Code - Development Watch is pleased that Coolum is largely categorised as Low Density Residential Zone. The purpose and overall outcome of the Low Density Residential Zone to provide for predominantly low density, low rise residential activities on conventional sized urban residential lots, is supported.

6.2.2 Medium Density Residential Zone Code - We note that there are some limited areas in the Coolum Local Plan Area identified as appropriate for Medium Density Residential Zone. The purpose and overall outcomes of the Medium Density Residential Zone are supported.

6.2.4 Tourist Accommodation Zone Code - We note that the Tourist Accommodation Zone is restricted to the Coolum Esplanade area and we believe this particular zone should be restricted to the current area.

6.2.4.2 The purpose of the Tourist Accommodation Zone Code is to provide for activities comprising predominantly multi-unit visitor accommodation and a limited range of retail, business and entertainment activities which primarily service visitor needs. Restriction to these activities is supported. In particular, the restriction of shop leasable floor areas to no more than 300m<sup>2</sup> is supported.

### **8.2 Centre Zones Category**

6.2.5 Principal Centre Zone Code - We support the Principal Centre Zone Code and the provision for the Maroochydore Centre to be developed as the Principal Regional Activity Centre for the Sunshine Coast sub-region.

6.2.6 Major Centre Zone Code - The Major Centre Zone Codes that make provision for various town centres to be developed as Major Regional Activity Centres is supported.

6.2.7 District Center Zone Code - Development Watch strongly objects to the Coolum town centre being designated as a District Centre Zone. See the section on major issues earlier in our submission, where our concerns are outlined in detail.

The zone description states that a district centre zone services the convenience needs of district catchments but neither defines “convenience needs” nor “district catchments”.

The district centre zone allows for new shopping centres with a maximum gross leasable floor area in the order of 5000 sq metres. This is far too large a size for Coolum. It is at least 5 times what is currently permitted in Coolum. This supports our argument Coolum Town Centre is recategorised as a local centre.

DW supports the restrictions on the nature of retail in a district centre zone, that is, no department stores, discount department stores and not more than one full line supermarket.

6.2.8 Local Centre Zone Code - Local centre zone code provides for a range of activities that meet the convenience service needs of individual rural towns and villages or coastal urban neighbourhoods, and provide local employment opportunities. We believe this definition better describes Coolum than the district centre zone.

Coolum West is a local centre zone and we support this category for Coolum West. The stated characteristics of local centre zones include:

- New shopping centres have gross leasable areas of around 2500 sq metres
- The role and function of existing shopping centres is maintained
- Total gross leasable floor area of all existing and approved business activities does not exceed any allocation specified for the activity centre in the local plan code
- Not more than one full line supermarket is established in any local (full service) activity centre.
- Higher order shopping facilities, including department stores and discount department stores are not established in any local activity centre.

The local centre zone allows for new shopping centres with a maximum gross leasable floor area in the order of 2500 sq metres. This is still far too large a size for anywhere in Coolum. It is at least 2.5 times what is currently permitted in Coolum. We object to any business activity premises of that size being permitted anywhere in Coolum and the Coolum Local Plan Code should be amended to reflect a much lower, preferably 1000 sq metre premise limit for any business activity.

### **8.3 Industry Zones Category**

6.2.11 High Impact Industry Zone Code - Development Watch strongly opposes the designation of the Coolum Industry Park as a High Impact Industry Zone. (Refer our comments at the beginning of this submission under “Major Issues”).

## 8.4 Recreation Zones Category

The Coolum Local Plan contains areas zoned as Sport and Recreation Zones and Open Space Zones. Development Watch is concerned that the limited areas available for sport and recreation and for open space is preserved and “off-limits” to development.

6.2.13 Sport and Recreation Zone Code provides for a range of organised sport and recreation activities while the Open Space Zone provides for open space and park functions for public use.

The purpose and overall outcomes of the Sport and Recreation Zone Code are supported.

It should be noted that the Sport and Recreation Zone in the Coolum Local Plan Area in West Coolum is incorrectly designated. The area is not fit for purpose and should be rezoned. The land is subject to flooding and inundation (according to the Flood Hazard Overlay Map - OVM30H). It is also isolated from public transport.

6.2.14 Open Space Zone Code provides for open space and park functions and the public use of such areas.

The purpose and overall outcomes of the Open Space Zone Code are supported.

## 8.5 Environmental Zones Category

6.2.15 Environmental Management and Conservation Zone Code provides for the protection and rehabilitation of land predominantly to maintain ecological processes. There are a number of significant environmental and conservation areas within the Coolum Local Plan Area (particularly along the coastal fringe) and it is critical that these areas remain protected. The Draft Plan should be amended so the protected areas within the Palmer Coolum Resort, rainforest, parabolic dunes etc are be included as environmental and conservation zones.

## 8.6 Other Zones Category

Development Watch has no specific comments to make on the various Zone Codes in the Other Zones Category with the exception of the Emerging Community Zone.

6.2.17 Emerging Community Zone Code is generally described as those areas where development is designed and coordinated to achieve safe, healthy and sustainable new urban communities. The zone generally applies to emerging urban residential areas.

We understand that development in an Emerging Community Zone is required to be undertaken in accordance with a master plan or plan of development.

Development Watch does not believe that the Palmer Coolum Resort should be designated as an Emerging Community Zone. While it is recognised that “planned” residential development has taken place, and could take place, in parts of the Palmer Coolum Resort, it is clear from the Infrastructure Agreement and other documentation that the main purpose of the resort is as an internationally recognised golf course and tourist resort. This is the primary function, which is not consistent with the nature of the Emerging Community Zone.

Our issues regarding the zoning of the Palmer Coolum Resort are detailed in the earlier section on Major Issues.

## **9 Uses and Other Development Codes.**

Given the time-frame available to consider the Draft Plan Development Watch has limited comments to some key codes. This does not mean that we have no issues with the other codes, simply that there has been insufficient time to review them.

### **9.1 Dual Occupancy code (9.3.5)**

#### ***Background:***

1. The Draft Plan envisages that dual occupancy will be limited to a dual occupancy precinct and medium density zones.
2. MP2000 (Vol4, 4.2):
  - a. required dual occupancy sites to be a minimum of 800m<sup>2</sup> in Neighbourhood Residential Zones and 600m<sup>2</sup> in mixed housing precincts, with different lot sizes if the slope of the land was 15% or greater;
  - b. limited dual occupancy lots in new developments to 15%, and in existing urban areas by not allowing dual occupancy lots to adjoin other dual occupancy lots; and
  - c. limited the total number of bedrooms to 6 and required each dwelling to have private open space of 80m<sup>2</sup>.

#### ***Issues and grounds***

1. There are concerns that the small dual occupancy precinct in Coolum could become a ghetto. It is more desirable to have dual occupancy lots scattered throughout an urban area but this would require the protections that previously existed in MP 2000 limiting the percentage in new developments and with no adjoining dual occupancy lots. A percentage limit on any one street would assist in maintaining the current character of the street.
2. Protections for amenity of occupants of dual occupancy lots and amenity and character of the neighbourhoods have not translated to the code in the Draft Plan. In particular:
  - a. Minimum lot size has reduced to 600m<sup>2</sup> for all settings. This is inappropriate for settings in medium density zones and for land with slopes of 15% or more;
  - b. Private open space for each dwelling has reduced from 80m<sup>2</sup> to 50m<sup>2</sup> which has a negative impact for occupants and neighbours;
  - c. There is no limit on the number of bedrooms as was the case in MP2000 and this could result in very inappropriate development, excessive traffic and car parking issues.

3. The acceptable outcomes do not address all the issues raised in each performance outcome. For example PO7 (e) states that development “maximises the retention of mature trees...” but AO7 does not include any acceptable outcome in relation to mature trees. Acceptable Outcome AO6.4 from the Multi-unit Residential Code 9.3.11 should be included as an AO for PO7 as follows: “*Existing mature trees are retained and incorporated into the design of the development.*”

## 9.2 Dwelling House code (9.3.6)

### **Background:**

1. MP2000 (vol 4, 4.1):
  - a. made clear that the dwelling density was one detached dwelling per lot, and annexed units (now called secondary dwellings) required a site size of 800m<sup>2</sup> or more, limited the size of annexed units to 45m<sup>2</sup> with no more than one bedroom and total site cover (detached dwelling and one unit) limited to 50%,
  - b. specified that small lots, defined as 600m<sup>2</sup> or less, required private open space of 100m<sup>2</sup> or 30% of site cover (whichever was the greater) and specified that decks, balconies and/or patios make up at least 15% of the building.
  - c. specified the setback as 6m and no less than 4.5m.
  - d. specified there be at least two car parking spaces on site.

### **Issues and grounds**

1. The draft code does not specify a minimum lot size where a Secondary dwelling is permitted and, coupled with a larger permitted size of secondary dwelling (from 45m<sup>2</sup> to 60m<sup>2</sup>), this could result in a dwelling house block appearing more like a very unattractive dual occupancy. The only protection is that maximum site cover for the dwelling house (including secondary dwelling, garage, shed and/or home office) is limited to less than 50%.
2. The reduction in car parking spaces for lots less than 300m<sup>2</sup> to one car parking space will result in cars parked on the street and an unattractive streetscape for local residents. All dwelling houses should have at least two car parking spaces as dwellings on a small lot can still have as many bedrooms (and therefore car driving occupants) as a dwelling on a larger lot.
3. The acceptable outcomes do not address all the issues raised in each performance outcome. For example Performance Outcome PO2 is supported, however the Acceptable Outcomes for PO2 do not address following desired outcomes:
  - (a) *is of a scale that is compatible with surrounding development;*
  - (c) *maximises opportunities for the retention of existing vegetation and allows for soft landscaping between buildings.*

The only AO for PO2 is that site cover is less than 50%. This hardly adequately protects the character of the surrounding dwellings or the retention of existing vegetation. Acceptable Outcome AO6.4 from the Multi-unit Residential Code 9.3.11 should be included as an AO for PO2 as follows: “*Existing mature trees are retained and incorporated into the design of the development.*”

### 9.3 Multi-unit Residential Code (9.3.11)

#### **Background**

1. The height overlay for Coolum local plan area in the Draft Plan limits the height of dwellings in the medium density and tourist accommodation zones to 12m.
2. MP2000 Code for Low Rise Multi-unit Residential Premises (Vol4, 4.3) is the most appropriate comparison and included some key provisions:
  - a. did not permit buildings to be longer than 40metres;
  - b. specified the site size and density;
  - c. required each unit to have clothes drying space in order to “..... to minimise the need for energy reliant clothes drying facilities” and specified requirements for that space.

#### **Issues and grounds**

1. DW supports the Purpose and Overall Outcomes (9.3.11.2) except:
  - a. the wording in (d) should be revised to make it clear that the intent is to also protect the privacy of neighbouring residents;
  - b. an additional point (e) should be added to clarify that the visual and other amenity of neighbouring residents is protected; and
  - c. a further additional point (f) should be added to make clear that existing mature trees are protected.
2. DW broadly supports the Performance Outcomes (PO) and the Acceptable Outcomes (AO) with the following comments:
  - a. There is no PO or AO limiting the length of the building resulting in unacceptably long buildings;
  - b. No minimum lot size is identified;
  - c. DW strongly supports PO6 and, in particular AO6.4: “*Existing mature trees are retained and incorporated into the design of the development.*”
  - d. DW strongly supports PO14 but AO14.2 reduces to 25% the minimum communal open space with no variation to accommodate the slope of the land as was the case in MP2000, thereby reducing the amenity of residents; and
  - e. DW strongly objects to PO17 which states:

As there is no definition of “clothes drying facilities” and it could be interpreted to mean “energy reliant” clothes dryers, it will encourage the use of such “energy reliant” clothes dryers as clothes drying facilities are only required where dwellings or rooming units are not provided with clothes drying facilities.

PO17 should be rewritten as “Residential buildings are designed and sited to minimise the need for energy reliant clothes drying facilities” with AO17 rewritten to require that each dwelling unit has a minimum outdoor and non-energy reliant clothes drying facility.