

4 June 2017

Draft Environment and Liveability Strategy
Sunshine Coast Council
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Draft Environment and Liveability Strategy

Thank you for the opportunity to respond to the Sunshine Coast Council's Draft Environment and Liveability Strategy, which aims to provide long-term strategic direction to guide growth and shape the Sunshine Coast for future generations to 2041.

The Property Council of Australia is the leading advocate for Australia's biggest industry – property. We are a national not-for-profit organisation established to promote the work of the property industry in delivering prosperity, jobs and strong communities to all Australians. Here in Queensland, the Property Council represents over 360 member companies across residential, commercial, retail, retirement living, industrial, tourism and education sectors.

Within the Sunshine Coast local government area, the property industry accounts for over 13% of all full time jobs and pays \$734 million in wages annually. The sector directly contributes \$1.76 billion to local economic activity, making it the Sunshine Coast's largest industry. Given the significance of the local industry to the region's economy, the health of the sector should be front-of-mind for all policy-makers.

Balance

The draft SEQ Regional Plan has projected that the population of the Sunshine Coast will grow by 207,500 people by 2041. This is a 72 per cent increase in population over the planning period, the third highest in South East Queensland behind Ipswich and Logan.

To accommodate this remarkable growth, while maintaining affordability and our enviable way of life, it is imperative that a balanced approach to planning be adopted by Sunshine Coast Council.

The Property Council contends that the final Environment and Liveability Strategy should clearly articulate that Council's approach is not just about preserving and protecting the region's key environmental attributes but it is also about finding ways to accommodate the projected population growth in a balanced manner.

The natural environment

It is important to recognise that not all landscape on the Sunshine Coast has an intrinsic value or visual amenity that necessitates its protection from urban development.

The need to accommodate future growth, both through greenfield and infill development, will necessitate the loss of some undeveloped landscape. Greater flexibility will be required within the final strategy to ensure that a balance is met between environmental and liveability outcomes and ensures long-term housing affordability.

'No loss of the regional inter and sub-regional inter urban breaks in the current extent by 2041' is a very blunt measure to use as a target of the strategy. Much of the inter-urban break is of no ecological value and it may be appropriate, before 2041, for Council to consider amending the designated area, or trading parcels of land, to achieve a better balance between natural environment and growth objectives.

The final strategy should give consideration to how Council plans to cater for growth in the urban footprint beyond the planning period. Future extensions to the urban footprint, beyond 2041, need to be contemplated within the life of this Strategy. Future growth may become heavily constrained if tight environmental protections are entrenched around the current urban growth boundary.

Identifying and mapping environmental assets has a very real impact on property rights and development potential. Council needs to ensure that its mapping/modelling of all environmental protection, flooding and coastal hazard areas is as accurate as possible. The Property Council welcomes Sunshine Coast Council's successful application for funding through the QCoast2100 program to improve the relevance, currency and suitability of its coastal data.

The environment we create

Rather than the constraints-led approach detailed in the draft strategy, the Property Council would prefer to see policy positions and targets set which affirm desired future urban outcomes, such as housing affordability, diversity of housing choice, built form innovation, and ongoing employment land supply.

Council's draft policy position, to concentrate future growth around activity and employment nodes, is reflective of the draft SEQ Regional Plan. A major challenge facing the Sunshine Coast Council is how to achieve the highly ambitious infill target set for the local government area through the Regional Plan. To achieve 64,200 additional infill dwellings by 2041, Sunshine Coast Council will need to accommodate a city the size of Ipswich within its existing urban boundary.

The final strategy must be very specific in stating Council's strategic objective of achieving higher density development within existing urban areas.

The development of this strategy provides Council with the perfect opportunity to begin an honest discussion about how its future growth target is going to be accommodated within existing urban areas. This will mean articulating the type of densities and built form that the community can expect to see more of, including increased building heights, smaller lots sizes, greater densities on unit sites, and less onerous and more flexible parking solutions.

Inflexibility in the interpretation of the planning scheme, and a lack of qualitative performance based planning outcomes to overcome building height limitations, will be a significant obstacle to achieving Council's infill objectives.

In the face of the daunting infill target, the Property Council would like to propose a joint workshop with key industry stakeholders and Council planners to identify appropriate design solutions and amendments to the current Planning Scheme that would help deliver these outcomes over the next 25 years.

While an increased mix of housing by 2041 is a worthy target within the draft strategy, the Property Council contends that maintaining relative housing affordability should also be a stated target. Ultimately, what Council should seek to encourage through their policy instruments is a

corresponding of supply to housing demand within the Sunshine Coast local government area. This includes meeting demand for a variety of housing types, and locations.

The Property Council welcomes the prospect, outlined in the draft strategy, of regular reporting against targets which will be produced every few years. Tracking progress towards housing targets is of critical importance. These reports should be used by Council to guide decisions in relation to increasing land supply or providing incentives to encourage particular types of development.

In the face of a looming shortfall in age-appropriate housing, the Property Council supported recent amendments to the Sunshine Coast Planning Scheme to increase heights for specific retirement village sites. We have previously raised the need to provide seniors' housing opportunities for our ageing demographic and acknowledge that Council has actively responded to this challenge through policy initiatives implemented through the planning scheme. Given the supportive policy settings and the increases to height for individual sites proposed in these amendments, a wider policy change that facilitates increased height for seniors' housing across the board should be considered by Council.

The objective to increase public access to environmental and open space areas is supported. Council may need to give consideration to the types of land uses it will accept and support in these areas and reflect this in the Planning Scheme.

In relation to flooding and stormwater policy positions, the Property Council encourages Council to be flexible to alternate and innovative solutions and allow more flexibility in their assessment models.

Council's draft target to increase the number of developments which are accredited as achieving a Green Star Rating of 5, or equivalent, is warmly welcomed by the Property Council. Council is encouraged to consider how their own SunCentral development may benefit from this accreditation.

The Property Council would welcome the opportunity to work with Sunshine Coast Council, and other industry and community stakeholders, to further refine and develop this important strategy.

If you would like further information on the Property Council's position in relation to these matters please feel free to contact me at any stage on (07) 3225 3000 or cmountford@propertycouncil.com.au.

Yours sincerely

A handwritten signature in black ink, consisting of a large, sweeping 'C' shape that extends to the right and then curves back down to the left.

Chris Mountford
Queensland Executive Director