



17 September 2023

**RE: Public consultation - *Shaping SEQ 2023 Update for the South-East Queensland Regional Plan (SEQRP)***

To whom it may concern,

The Noosa Shire Residents and Ratepayers Association Inc (NSRRA) thanks the Department of Infrastructure, Local Government & Planning (DILGP) for this important opportunity to provide feedback regarding the *South-East Queensland Regional Plan (SEQRP)*.

Noosa Shire Residents and Ratepayers Association is a volunteer, not-for-profit community organisation operating for the benefit of residents and ratepayers in Noosa Shire. NSRRA has a proud history of advocating on behalf of the community, hosting public forums, petitioning, and lodging submissions on matters of importance to members and residents.

**Executive Summary**

**The NSRRA strongly objects to mandated population increases for Noosa Shire outlined in the *Shaping SEQ 2023 Update*. We consider the revised *SEQRP* policies directly conflict with the strategic intent of every iteration of the *Noosa Planning Scheme* since its inception.**

**Population:** The *SEQRP* 'Gentle Density' strategy imposes significant population growth in Noosa Shire through increased development density. This includes proliferation of new low to medium-rise development precincts within Noosa's 'urban footprint'.

The proposed *SEQRP* amendments undermine the strategic intent of the *Noosa Plan 2020* to control population growth, retain amenity and sustainably manage development based on the Shire's 'carrying capacity'.

After two decades of public consultation, the *Noosa Planning Scheme* has evolved to:

- respect Noosa's world-renowned biodiversity,
- acknowledge our geographical constraints,
- manage the region's limited capacity to provide services and infrastructure to accommodate residents and visitors; and
- maintain Noosa's status as an iconic tourism destination, which is underpinned by our reputation as a sensitively developed, low rise destination, that protects its natural assets.

NSRRA objects to the *SEQRP* strategy to expand development and increase density with mandated population targets as they effectively force Council to alter the strategic intent of its planning scheme, regardless of community sentiment.

That the State instructs local government to conduct public consultation for delivery of non-negotiable population growth, regardless of community feedback, makes a mockery of the consultation process.



**Planning Regulation:** The NSRRA also has concerns with the *Shaping SEQ 2023 Update* Regulation Amendment Consultation paper which proposes amendments to *Schedule 10, Part 16* of the Planning Regulation.

These *Regulatory Provisions* control development on land zoned Regional Landscape & Rural Production Area (RLRPA) and Rural Living Area (RLA).

NSRRA has specific objections to Proposals 1, 2 and 6 which weaken protections of RLRPA zoned land from subdivision and inappropriate tourism/recreational development. (See below- Section 4)

### [1] 2041 Population Projections

The *Shaping SEQ 2023 Update* includes revised, increased and seemingly non-negotiable population targets for the Noosa Shire. NSRRA notes the population projections for 2041 described in Noosa Council's *Housing Needs Assessment Report 2021* (HNAR):

*"According to the 2018 edition of the Queensland Government population projections, the population of Noosa Shire is projected to increase from 54,033 persons in 2016 to 64,999 persons in 2041."*

In contrast, the *Shaping SEQ 2023 Update* data indicates the SEQRP Noosa Shire is now required to accommodate an extra 19 100 persons by 2041, taking the permanent resident population to 76 000. This represents an 11 000 person (17%) increase to future population projections gazetted by Council in the *Noosa Plan 2020*.

NSRRA objects to the State mandating fast-tracked population targets on the following grounds:

- A. Under existing population growth pressure, Noosa's limited infrastructure and services face ongoing challenges with provision of roads, water supply, waste treatment, education facilities, health & aged care services etc.

NSRRA is concerned the SEQRP strategy to fast-track Noosa population growth fails to consider the excessive tourist populations impacting Noosa every weekend, event, and holiday period. With Noosa Heads being both the major population centre and the drawcard for tourists, it's an unavoidable reality that Noosa's geographically constrained road network (it's a dead end) is having far more frequent and disruptive traffic gridlocks.

- B. In addition to increasing pressure from tourism and residential development within the Shire, Noosa's transport infrastructure and services are required to accommodate visitation from expanding resident populations at the northern end of the Sunshine Coast Council (SCC) area. Given their proximity to Noosa Shire, many residents of regions such as Eumundi, Peregian Springs, and Coolum consider Noosa as their community of interest.
- C. The *SEQRP* indicates SCC population projections have also been updated with an increase of 206 400 persons. A significant proportion of this residential growth will occur in the development expansion areas at the northern end of the Sunshine Coast region (adjacent to Noosa). This can only increase pressure on Noosa's transport infrastructure and other services.



- D. NSRRA rejects any contention the *Shaping SEQ 2023 Update* fast-tracking of development in Noosa will have any relieving effect on housing affordability. Noosa Shire is an extremely desirable place to live with an exclusive and valuable real estate market. Obviously, Noosa will never meet the demand of those who'd understandably like to live here.
- E. The NSRRA notes the *SEQRP* fails to ensure new development doesn't just enter the market at maximum real estate values, which are already unaffordable for the local workforce.

The *SEQRP* strategy is therefore unlikely to have any discernible impact on Noosa's 'housing affordability'. Subsidised and or social housing can provide some solutions to Noosa's housing crisis and the NSRRA notes State Government progress in this policy area.

- F. NSRRA has concerns State infrastructure planning fails to outline a timeframe to duplicate Beckman's Rd. This is the major access for the current regional workforce to reach Noosa Heads from Cooroy. Beckman's Rd and Butler St in Tewantin come to a daily stand still as workers who can no longer afford to live in Noosa attempt to access coastal jobs.

The NSRRA also has concerns excessive population growth will exacerbate the failure of the rapidly expanding Sunshine Beach education precinct road network to accommodate increasing school traffic.

- G. Larger urban growth centres have scalable public transport systems to accommodate growth however Noosa Shire's size, population spread, and geography excludes rail or even light rail as a solution. The effectiveness of the bus system is also limited by the layout of population centres and capacity of the local road network to accommodate current loads, as described above.
- H. NSRRA is concerned that the simplistic *SEQRP* solutions for Noosa Shire's growth challenges fail to account for the Short-Stay Accommodation sector's impacts on local housing/rental availability and affordability.

Approximately 4000 of Noosa Shire's 26000 residential dwellings (15%) have been lost to commercial tourism. A recent University Queensland study confirmed Noosa has the highest rate of Airbnb saturation in South-East Queensland.

- I. The NSRRA objects to a consultation process where the State mandates population targets, insists Council undertake conduct public consultation on 'gentle density' strategies and forces increased population and density, regardless of community feedback.

NSRRA has previously raised concerns with Noosa Council's regarding its public consultation processes becoming box ticking exercises, such as occurred during consultation for Noosa Council's *Housing Strategy 2022*, with its questionable and predetermined outcomes.



## [2] Dwelling diversity targets and “Gentle Density”

SEQRP population targets described in the SEQ 2023 Update (Page 84) are forecast to be delivered by decreasing single storey detached dwelling numbers, and significantly increasing low-rise (1-3 storey) and medium-rise (4-8 storey) developments.



In addition to the pressure more intensive development places on infrastructure and services, State dwelling diversity targets threaten Noosa’s amenity. Noosa has very few dwellings in the medium-rise category with the *Noosa Plan’s* height limits on development. This now appears under threat.

NSRRA therefore strongly objects to the SEQRP ‘gentle density’ strategy as it fails to account for Noosa’s point of difference to much larger and heavily developed coastal communities. E.g. The Gold and Sunshine Coasts’ where medium and high-rise developments are commonplace.

NSRRA notes the *Shaping SEQ 2023 Update* effectively forces Council to implement ‘dwelling diversity targets’ regardless of community concerns or objections:

*“Local governments are required to meet the dwelling diversity targets set by the ShapingSEQ 2023 Update.”*

NSRRA considers the SEQRP “Gentle Density” strategy a simplistic attempt to impose a planning solution designed to increase the concentration of dwellings in large urban centres, on to a relatively small regional coastal town, regardless of whether it’s appropriate for Noosa Shire, or supported by the community.

## [3] Northern Sub-Regional Outcomes

NSRRA has concerns the *Shaping SEQ 2023 Update* increases to population growth aren’t restricted to the consolidation areas referred to in the ‘gentle density’ strategy.

We note with interest the *Shaping SEQ 2023 Update* includes plans for Councils in the Northern Sub-Region to investigate additional urban growth areas:

*Shaping SEQ 2023 Update:*

*“Although there are no other PFGAs identified in the Northern sub-region, Sunshine Coast and Noosa Shire councils are encouraged to investigate the potential additional longer-term urban growth opportunities, giving consideration to broader strategies for their long-term rural, environmental and landscape sustainability.”*



NSRRA contends any new urban development on land in Noosa's Regional Landscape and Rural Production Area threatens the strategic intent of the *Noosa Plan 2020*.

Considering Noosa's geographical constraints, new urban precincts would adversely impact Noosa Hinterland's amenity and environment and potentially fragment the limited Agricultural Land Conservation Area (ALCA).

#### **[4] Planning Regulation**

NSRRA objects to weakening of protections against inappropriate development of land zoned RLRPA, as described in the *Shaping SEQ 2023 Update Regulation Amendment Consultation paper-July 2023*.

NSRRA has specific concerns with following proposed changes outlined in Schedule 10, Part 16 of the Planning Regulation which prescribe regulatory provisions for land zoned RLRPA and RLA:

- A.** NSRRA objects to *Proposal 1 Division 1*. Facilitating "expansion of rural towns and villages" by amending "the existing Rural Subdivision Precinct provisions to provide a clearer process to identify targeted areas where the subdivision prohibition will not be in effect in the RLRPA."

NSRRA notes the *Noosa Plan 2020* already contains significant and yet undeveloped capacity for population growth in the Hinterland's consolidation and expansion areas.

Significantly increasing peri-urban development in the Hinterland prior to existing development expansion approved in the *Noosa Plan 2020* being realised or actioned, flies in the face of responsible strategic planning.

- B.** NSRRA objects to the *Proposal 2 Division 2* removal of referral trigger assessments for tourist or sport and recreation activity on rural land. The Noosa Hinterland is suited to small-scale, low impact tourism activity and has a record of opposing large scale tourist development.

NSRRA notes the most significant contemporary challenge to the *SEQRP Regulatory Provisions* which protect RLRPA from large-scale tourism development was in 2007, when Council and State planners refused the Titanium Enterprises 522 ha 'Edge' resort development proposal.

(This was refused due to its significant conflict with *SEQRP Regulatory Provisions*)

NSRRA considers removing referral triggers and the 'overriding need in the public interest' test for tourism developments is a retrograde step which fails to consider potential developer exploitation of weakened *Regulatory Provisions*.

Large-scale tourism development of the Noosa Hinterland would inevitably result in planning conflicts, environmental impacts, and diminished amenity.



- C. NSRRA objects to *Proposal 6 Division 6* which represents a relaxation in regulation for stand-alone function/wedding facilities by no longer considering this Use as an ‘urban activity’ on land zoned RLRPA.

Weakening these *Regulatory Provisions* with measures such as removal of the ‘overriding needs’ test, fails to adequately consider the inevitable planning conflicts caused by siting large scale function facilities in quiet rural living or primary production areas.

Such facilities are intrinsically urban in nature, given they attract intensive vehicle traffic, create noise, shed light pollution, and require large buildings and ancillary infrastructure to facilitate their use.

### Conclusion

The NSRRA requests the State Government revise population and dwelling density projections detailed in the *Shaping SEQ 2023 Update* and give careful consideration to the potential impact of overruling Noosa Shire’s hard won urban and rural planning protections.

We look forward to your response.

Yours Sincerely,

Secretary