

The Chief Executive Officer  
Sunshine Coast Regional Council  
PO Box 72  
SUNSHINE COAST MC QLD 4560

## NOTICE OF SUBMISSION

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**Application No:** MCU07/0130

**Name of Applicant:** Stockland Developments Pty Ltd

**Applicants Agent:** CONICS (Sunshine Coast) Pty Ltd

**Agents Address:** 1 Innovation Parkway, Birtinya (PO Box 149) Wurtulla Qld 4575

**Nature Of Proposed Development:** Material Change of Use (Pursuant to Section 3.1.6 of the Integrated Planning Act 1997 – Overriding the Planning Scheme) including a range of residential uses, conservation area and open space in accordance with the Twin Waters West Master Plan.

**Address of Land:** 581-593 David Low Way; De Vere Road; 232, 252, 258, 266, 274, 282 & 284 Godfreys Road, Pacific Paradise, Stillwater Drive, Twin Waters and Described as Lot 1 on RP 811523; Lot 3 on SP 166012; Lots 1 & 2 on RP 103117; Lot 3 on RP 842858, Lots 4, 5, 6, 7 & 8 on RP 98356 and Lot 2612 on SP 124274

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Pursuant to the Integrated Planning Act 1997, the Twin Waters Residents Association (TWRA) wishes to make the following submission.

The TWRA is a very active organisation within the Twin Waters community. At present, we have 327 members which would indicate that more than one third of all families in Twin Waters are members of our association. We have been active in promoting awareness in the community about the Stockland proposal, including the sending of several broadcast e-mails to members; placing of information on our web site at [www.twra.net](http://www.twra.net); publishing of items in the TWRA Newsletter delivered to all homes in Twin Waters every month and holding a Community Information Meeting on 24 February attended by approximately 200 people.

The feedback we have received from the residents and members is that there are significant concerns with the Stockland proposal as presented. While some members would prefer that there be no development of the subject area under any circumstances because it is on the Maroochy River flood plain, others would consider supporting development if it was of a different character and the major concerns about traffic and water are addressed to their satisfaction. We believe that the majority view is that the development should not proceed under any circumstances. This has certainly been the most vocal view expressed at our meetings.

It is noted that the application is for approval for a Material Change of Use i.e. a change in the zoning of the area from Sustainable Canelands to Residential. It is also noted that it is not necessary for the applicant to provide substantial detail about what will happen in the area if the MCU is approved. Most significantly, this Public Notification Period is the only opportunity the community will have to formally express their views about the Stockland proposal. Therefore, the community has no alternative other than to work with the material that Stockland has submitted to Council in support of its application. Council should be aware that this is a problem. The community is being asked to comment about what will be a significant development immediately adjacent to it and with limited insight into what might happen if Council does approve the MCU application.

Against this background, the TWRA, on the advice of a significant number of its members, requests that Council does not approve the proposed Development Application from Stockland Developments Pty Ltd as proposed, for the reasons outlined below:-

Twin Waters Residents' Association Inc.  
PO Box 9351 – Pacific Paradise – Qld 4564  
Web Site: [www.twra.net](http://www.twra.net) Email: [info@twra.net](mailto:info@twra.net)

## **1. Maroochy River Plains, East Maroochy Canelands**

The proposal to override the existing planning scheme (Maroochy Plan 2000 – MP2K) is in conflict with Planning Area 23 (7) East Maroochy Canelands MP2K and inconsistent with the character of the area reflected in the intent therein. The area is not classed for either urban or for rural residential use. It is on the Maroochy River Floodplain. Its classification should not be changed.

## **2. Traffic**

The proposal for one major road access at Ocean Drive (roundabout at Toyango Street) and a minor access road at Esperance Drive is manifestly inadequate compared to the eight access points to Ocean Drive for the existing Twin Waters Community. Additional access points for any development in the subject area should be direct to David Low Way or via De Vere Road and also to Godfreys Road.

Traffic turning to / from David Low Way is already very heavy. Lend Lease provided funds for future traffic lights. These should be installed as part of any development.

From the outset, the TWRA advised Council that it considered traffic access and traffic management to be one of the most significant issues for resolution if the subject area was to be developed. The traffic studies submitted by Stockland appear to be based on data from 2004 surveys extrapolated to provide the basis for the proposed traffic system. In view of the massive changes that have occurred in the area since 2004, this seems an inadequate basis for traffic studies. Twin Waters was not fully developed in 2004. It is now. The Pacific Paradise By-pass did not exist in 2004, but it will soon be opened. The effect of this on David Low Way traffic is unknown, even at this stage. More importantly, Twin Waters residents already face problems turning to and from David Low Way. The proposal for virtually double the existing traffic volumes to enter Ocean Drive via a new roundabout at Toyango Street will almost certainly cause major problems at David Low Way and traffic is likely to tail back through the new roundabout.

The proposal also states that there will be a “minor” access (estimated 5%) through Twin Waters at Esperance Drive. However, this seems to be a total “guesstimate” as traffic that encounters problems at the Toyango Street roundabout will almost certainly start to move through the single proposed alternative exit at Esperance Drive, Twin Waters. Stillwater Drive and Wattlebird Drive are not built to take large volumes of traffic.

The TWRA recommends that the traffic layout and access plans be reviewed. Additional access should be direct to /from David Low Way or via De Vere Road. Also, there is existing access to the area via Godfrey’s Road. This should be expanded to make an additional access to the development. Certainly, all construction traffic should be required to travel via Godfrey’s Road.

The TWRA considers that the traffic systems in the current proposal are inadequate and require a complete re-think if the development is to be approved.

## **3. Water / Flooding**

The TWRA has always been concerned about water management on the site and flagged its concerns to Council when the proposed development was first mooted. While it is acknowledged that Stockland has submitted to Council the results of what appears to be substantial studies, we are not equipped to critically review and analyse the proposal and especially the assumptions and logic of the flood modelling studies. It can be stated, however, that some of the conclusions of the studies do not intuitively follow.

Twin Waters residents are concerned that water displaced by the development will adversely affect the existing Twin Waters development and other North Shore areas. We are also concerned that “climate change” effects are adequately accounted for in the studies and conclusion.

The TWRA requests that Council seeks independent specialist professional advice to review Stockland’s submissions on water / flooding and, in particular, Council verifies that existing Twin Waters residents are not exposed to any increased risks – now or in the future - as a result of this proposal from Stockland.

#### 4. Lot Sizes and Character & Description

Twin Waters is designated as Precinct 15 under the Maroochy Plan 2000. It has distinctive characteristics relating, inter alia, to its layout, landscape infrastructure, lot sizes, building covenants and so on.

Based on the information provided by Stockland, the proposed development will be of a completely different character to that which exists at Twin Waters. The proposed average Lot size of 400 square metres (with some Lots in the 200 square metre range) is far too small and will result in high density housing with children forced to play on streets. Further, Stockland is overtly promoting low-cost affordable housing for first-home buyers, with its CEO recently stating that 65% of Stockland's residential sales were in this market. This is a completely different market segment to the Twin Waters market.

The use of the name "Twin Waters" within the proposed name of the development is misleading given the development bears very little similarity to the existing Twin Waters community. The Twin Waters community considers that the name is being misrepresented for purely commercial and marketing reasons and the proposed development should be considered as a separate Precinct.

Thank you for your consideration.

Full Name of Submitter: Twin Waters Residents' Association Inc.

Signature(s):

G Billard, President: S Lever, Secretary

Date: 9 March 2009

Postal Address: PO Box 9351  
Pacific Paradise  
Qld 4564