

8 March 2022

Department of Transport and Main Roads

Email: SouthernSunshineCoastPT@tmr.qld.gov.au

CC: transportandmainroads@ministerial.qld.gov.au

To Whom it May Concern

Re Feedback Draft Southern Sunshine Coast Public Transport Strategy

We are writing to express our group's thoughts on the above Draft Strategy. Please refer to Appendix 1 for our credentials.

Overall, we welcome the drafting of such a strategy and the opportunity to have input into the final document. We note you say this strategy "will provide strategic network context for the detailed business case for the first stage of a *Mass Transit* connection between Maroochydore and Kawana and provide a plan for future stages of the network's expansion". We further note your strategy aligns closely with the Sunshine Coast Mass Transit Master Plan' as outlined in the Sunshine Coast Regional Council (SCRC) Options Analysis Report Oct 2021, Appendix 2. We are therefore assuming your proposed staging and priorities also reflect those outlined in the SCRC document, Appendix 3. It will be based on these parameters that we provide our feedback.

As a general overview of our feedback:

- The strategy is a step in the right direction to delivering better public transport to the Sunshine Coast;
- The strategy falls short as a regional solution as it does not include the northern sector;
- **The Western Corridor** we support;
- **The Centre Corridor** we support but only if delivered in the first stage Beerwah to Maroochydore and then stage 2 to the airport. Anything else suboptimizes the benefit to the region. We further believe this should be the first priority of the strategy, not *mass transit*;
- **The Coastal Corridor** we support a flexible public transport system along the coastal corridor that can grow and adapt as the population increases. We do not support a *mass transit system* that requires fixed and inflexible infrastructure as proposed by the SCRC in their Options Analysis Report, i.e. Light rail (with or without wires), trackless trams or a rapid bus network. We also do not support the densification of this corridor to justify such infrastructure;
- **The Key Connectors** we support an intricate network of feeder systems throughout the coast. We are a decentralized community that is not lineal. East-West movements are critical to the region. We do not believe your strategy goes far enough to deliver enough East-West solutions and further routes should be considered. The Northern sector needs should also be included in this section. We also believe these key connectors could be implemented now to improve the current state of Public Transport in the region.

Detailed Draft Strategy Feedback

1. The input documents provided to you from the Sunshine Coast Regional Council were biased towards a *mass transit system* along the coastal corridor and in particular Light Rail.

You state this strategy has been developed through consultation with the Sunshine Coast Regional Council and that it will set a benchmark that all levels of government can work towards. We feel it necessary to point out that in completing the Options Analysis, the SCRC:

- a) ignored over 1000 community submissions against their plan. (These have been sent separately to you as part of our feedback);
- b) failed to eliminate bias towards a lineal *mass transit system* along the coastal corridor and in particular Light Rail. We base this on the following:
 - Analysis of historical literature since 2012 indicates the SCRC had already developed a bias towards a *mass transit system* and in particular Light Rail, well before the commencement of the Options Analysis Report. The Council's website was amended in April 2021 to recognise this fact but claims that Council, in commencing the business case process in 2018, was no longer fixated on Light Rail. However, documents released in 2019 and 2020 still referenced Light Rail. These include the Preliminary Business Case Interim Findings Report (Jan 2020), as well as the Maroochydore City Centre PDA Amended Development Scheme 2019;
 - SCRC appointed, in 2019, consultants (PwC) to prepare the Preliminary Business Case Analysis. PwC openly stated in their tender documents they were "Committed to seeing Light Rail come to fruition on the Sunshine Coast", (Appendix 4). This document later became the basis for the final Options Analysis Report;
 - Many of the same Council personnel who were strongly supporting Light Rail in earlier documents, were actively involved in the preparation of the final Options Analysis Report.

2. Our research and community feedback indicates the recommendations and the thinking shaping the Options Analysis report 2021 were completely out of sync with community attitudes. The Delivery of a Centre Corridor (CAMCOS) should be prioritized first, not *mass transit*.

The feedback we received from the Community during the Mass Transit Options Analysis community consultation in 2021, is they did not agree with the prioritization of a *mass transit system* over a heavy rail solution (CAMCOS). This feedback was both verbal and written comments either via email or part of surveys we ran. The community overwhelmingly stated they wanted to see a passenger rail connection from Maroochydore to Beerwah and onto Brisbane BEFORE any *mass transit* project was implemented.

MTAG, through our website, ran our own survey in 2021. Over 260 responses were received.

We asked: Which of the following Mass Transit Options would you prefer to see happen on the Sunshine Coast?

1. Fast rail from Maroochydore to Beerwah (via the CAMCOS corridor) and integrated with a modern bus system
2. Light Rail initially from Maroochydore to Kawana (stage 1) then from Kawana to Caloundra (Stage 2)
3. Neither

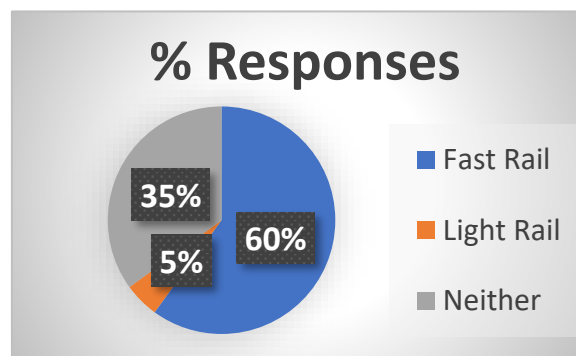


Table 1 Resident's responses to the Choice of Fast Rail, Light Rail or Neither 2021

Source: MTAG Online survey 2021

Our conversations with residents indicated CAMCOS is not so much about a preference for “Heavy rail” per se, as a desire for greater connectivity throughout the Sunshine Coast and to Brisbane. The allure of a transport system that would enable a reliable, and easy alternative to getting to/from Brisbane with stops at key centres along the way, is seen by many as the answer to traffic congestion issues not only around the Coast but on the Bruce Highway and one they would be willing to use if it was available.

The connectivity of the CAMCOS corridor to major development centres such as Aura, the future Beerwah East and the new Maroochydore CBD is seen by many to offer the means to service a greater proportion of the current and future population's transport needs. This direct Brisbane to Maroochydore connection would also support the tourism industry providing an alternative to highway travel.

3. The implementation of a Centre Corridor solution (CAMCOS) should not be “staged”.

The SCRC's Options Analysis calls for the CAMCOS corridor to be delivered in three stages:

- Stage 1 Beerwah to Kawana
- Stage 2 Kawana to Maroochydore
- Stage 3 Maroochydore to the Airport

We believe such staging would suboptimize the benefits of this infrastructure and lead to reduced utilization. We believe it should be a two staged implementation.

- Stage 1 Beerwah to Maroochydore
- Stage 2 Maroochydore to Sunshine Coast Airport.

A final station in Kawana is not a convenient destination for people to arrive or leave the Sunshine Coast. It is also over 13km away from what is being developed as the tourism, business, and retail hub of the region at the Maroochydore CBD. Once in their car, we believe people will continue to “drive on” rather than take multiple modes of transport to reach a connection to/from Brisbane that is located so far south in Kawana.

4. The Coastal Corridor solution should not be a fixed infrastructure *mass transit system* but a flexible system that can adapt and change with population growth.

During 2021, MTAG conducted several surveys, pop up sessions and other face to face activities with the Community. During the SCRC Public Consultation on the Options Analysis MTAG collected and submitted to the SCRC 1012 handwritten personal submissions, regarding the *mass transit* plan as outlined in the Draft Options Analysis Report. All these submissions have now been forwarded to you for your consideration. (Please refer to Appendix 5 section 2 (MTAG submission to SCRC) for a detailed analysis of these submissions and other surveys.)

Key highlights of these submissions:

- 97% against Light Rail or any other fixed transport system for 13km from Maroochydore to Kawana;
- 96% against changing the Planning Scheme to allow substantial “infill” development along the Light Rail/Coastal Corridor;
- the three most common reasons stated for objecting to the Draft Options Analysis, were:
 - Supports heavy rail line/other forms of public transport (68%);
 - Affect the appeal/aesthetic of the region (66%); and
 - Do not want to be like the Gold Coast (27%).

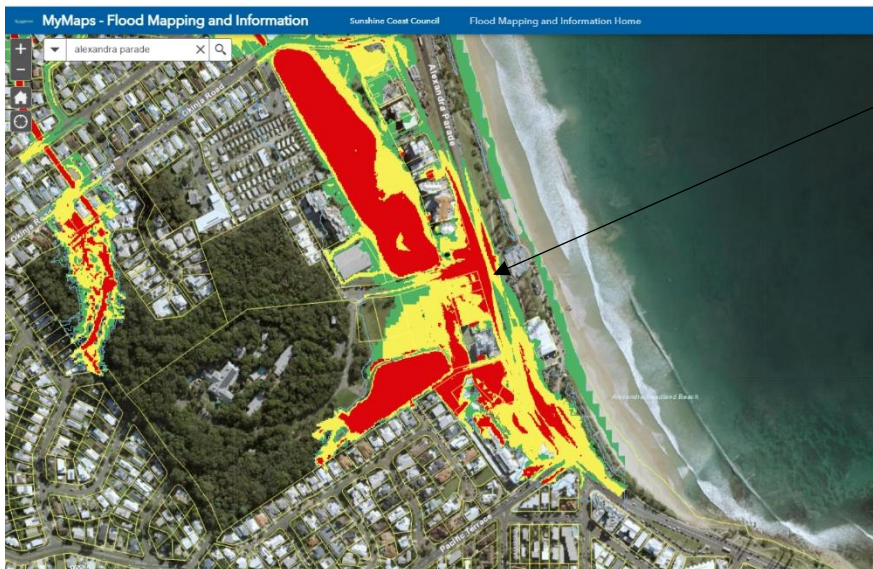
Other major themes that emerged from the community feedback we received were:

- The Community do not want Light Rail or any other fixed infrastructure transport options such as trackless tram or rapid bus, along the coastal corridor;
- The Community do want a flexible transport system (mostly buses) that can expand as the region grows;
- The coastal corridor currently has the most frequent and reliable public transport in the region (the 600 bus) and hardly anyone is using it. How is a *mass transit system* going to change this behaviour along the identical route?
- 13.6km of *mass transit system* is not going to benefit the majority of the people living on the Sunshine Coast, but they will be asked to pay for it; and
- A *mass transit system* is a lineal solution and that proposed solution does not address the public transport issues of this decentralised region.

5. The proposed Mass Transit route is subject to flooding.

The SCRC Options Analysis Report 2021 identified a route from Maroochydore to Kawana via Alexandra Parade and Brisbane Road. Analysis of the SCRC own flood mapping indicates both of these areas represent medium or high flood risk zones.

Alexandra Parade Flood Map (medium and high risk)

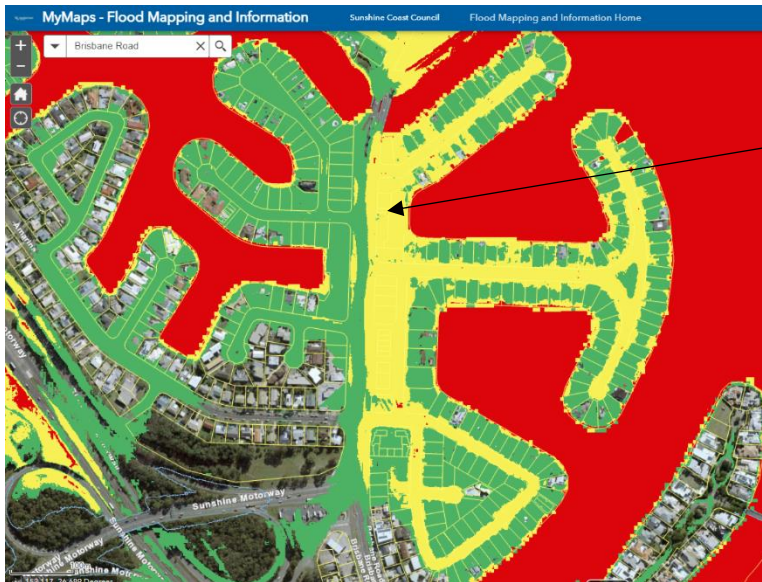


Source: Sunshine Coast Regional Council Flood Map update Aug 2021

Red = High Risk

Yellow = Medium Risk

Brisbane Road Flood Map (medium risk)



Flooding in either of these areas is not only likely to cause major disruption to any *mass transit* system but also significant damage to any fixed infrastructure. We therefore contend, if this route is to be utilized for any form of *mass transit*, the mode chosen needs to be flexible and manoeuvrable (not fixed) to avoid flood waters in times of serious flooding. We would further contend, the route should be reviewed to avoid these areas all together.

6. The draft strategy focuses on “spinal” transport solutions rather than a “spider web” network. The Sunshine Coast is a decentralized community that is not lineal. The majority of residents do NOT live in the proposed *mass transit* corridor (Stage 1). East-West movements are not adequately catered to in this strategy.

A key focus of this draft strategy is the coastal corridor and in particular a *mass transit* solution along this area. The proposed lineal 13.6km of stage 1 of the *mass transit* solution (Maroochydore to Kawana) currently represents only 8% of the total Sunshine Coast population. (Census data 2016 reflects 23,222 residents in the corridor vs 303,389 in the region). The SCRC project in their Options Analysis report for this number to only grow to 11% of the population by 2041 to 55,072 residents in the corridor vs 518,004 in the region.

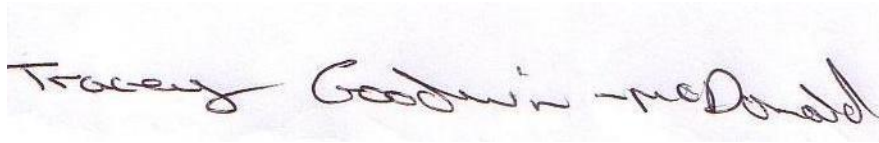
Approximately 90% of the Sunshine Coasts population both now and out to 2041 live and will continue to live beyond this proposed *mass transit* corridor. To reach this corridor they will require an intricate, frequent, flexible, and reliable public transport network or drive their car. The current Key Connectors strategy does not go close to addressing the needs of these people; especially given the strategy does not include residents living north of the Maroochydore River.

MTAG’s position is the region does need a public transport strategy for now and into the future.

Your strategy, whilst having some very strong elements such as the delivery of a central corridor solution is a good start but does not adequately address the public transport issues the region is facing now and will be facing out to 2041. The community is seeking a modern, efficient, environmentally friendly, and flexible public transport system that can grow with our population. This system needs to be region-wide and offer an improvement over the current options. The starting point of the proposed \$2+ billion lineal *mass transit* system for only 13.6km will not bring about the quantum usage shift required to address the traffic congestion issues of the region in the future.

We welcome your initiative in developing this draft public transport strategy and look forward to its progression based on the feedback we have provided.

Yours sincerely

A handwritten signature in black ink on a light-colored background. The signature reads "Tracey Goodwin-McDonald" in a cursive, slightly slanted script.

Tracey Goodwin-McDonald

President

Sunshine Coast Mass Transit Action Group Inc

Appendix 1

What is MTAG

The Sunshine Coast Mass Transit Action Group Inc (MTAG) is an incorporated community organization established in August 2020 to drive awareness of the Sunshine Coast Regional Council's (SCRC) Mass Transit Plan and ensure the community had the opportunity to have a say in its final content. Our establishment was born out of our view that the SCRC had failed to adequately keep the community up to date in a timely manner, regarding this major project.

MTAG's Executive membership represents a broad spectrum of ages, skills, and political allegiances across the region. The Executive membership consists of individuals with experience in Engineering, Business Case and feasibility assessments, Law, Local Government and Business Expertise.

To inform ourselves as to the background of public transport in the region, our starting point was a detailed analysis of all previous Mass Transit literature produced by the Sunshine Coast Regional Council, Infrastructure Australia, Transport and Main Roads and other Qld Government documents. Such documents included but were not limited to the following:

2012	SCRC Line in the Sand
2013	SCRC Sunshine Coast Light Rail-Shaping our Future
Oct/Nov 2014	SCRC Community Consultation Light rail Project
May 2015	Sunshine Coast Light Rail report presented to Council (based on community input)
2017	Shaping SEQ Southeast Queensland Regional Plan
Feb 2017	SCRC Urban Transformation Directions Paper
May 2019	Qld Gov't press release from Premier Commitment to funds to develop a Detailed Business Case (DBC) (1st stage Maroochydore to Kawana) \$7.5million State Govt funded
Jan 2019	SCRC Sunshine Coast Integrated Transport Strategy
Jul 2019	SCRC Strategic Business Case
Jan 2020	Price Waterhouse Coopers Preliminary Detailed Business Case Interim Findings
Apr 2021	SCRC Draft Options Analysis Report
Oct 2021	SCRC Final Options Analysis Report
Feb 2022	Qld Gov't Draft Southern Sunshine Coast Public Transport Strategy

Discussions with Sunshine Coast Federal MP's, Sunshine Coast State MP's, Queensland Government Minister Bailey's office and Sunshine Coast Regional Councillors were undertaken. A review of the Gold Coast Light Rail including visits to the Gold Coast and meetings with Gold Coast Councillors also occurred.

Since inception, we have grown to be an extensive grassroots community advocacy group that is speaking with and receiving feedback about the Community's thoughts on public transport on the Sunshine Coast and in particular the proposed Mass Transit plan.

Through our digital platforms, we reach over 10,000 Sunshine Coast residents monthly. We have over 60 volunteers, have letterbox dropped over 60,000 flyers, have conducted numerous online surveys, have done face to face pop up sessions at local markets and beach access points and presented at numerous community organization member meetings.

Appendix 2

Sunshine Coast Regional Council Transport Master Plan

Mass Transit Options Analysis 2021



Appendix 3

Sunshine Coast Regional Council Priorities for Mass Transit Investment

Mass Transit Options Analysis 2021



Appendix 4

PwC tender document to Sunshine Coast Regional Council re the mass transit project. 2019

RTI20/033 page 119

Contract Name: Sunshine Coast Mass Transit Project - Business Case Adviser and Economic and Financial Analyses
Contract Number: IT1878

2.4 Contribution to Local Economy

RESPONDENT'S NAME: PricewaterhouseCoopers

Council aims to encourage the development, growth and sustainability of the local economy within the Sunshine Coast local government area (LGA). Refer to [this map](#) for the boundary of the Sunshine Coast LGA. Council will evaluate this criterion by considering the financial and social contributions made by your business to the local economy. Please refer to Council's [Social Strategy](#), [Regional Economic Development Strategy](#) and Local Preference in Procurement Guideline for more information.

Respondents are to confirm if they identify as one of the following:	
(a) Locally owned and operated (primary office within the Sunshine Coast LGA, as well as any employees); or	<input type="checkbox"/> Yes
(b) Are not locally owned, but have a local operation/office in the Sunshine Coast LGA with local employees; or	<input checked="" type="checkbox"/> Yes
(c) Are not locally owned, or have a local operation/office, but have employees who reside within the Sunshine Coast LGA; or	<input type="checkbox"/> Yes
(d) Have no operation or employees based within the Sunshine Coast LGA.	<input type="checkbox"/> Yes
Respondents who identify as either (a), (b), or (c) above, must provide details below to demonstrate their local presence within the Sunshine Coast LGA:	
Address of local operation/office (if applicable):	Not applicable
Function of local operation/office (if applicable):	Not applicable
No. of employees performing in local operation and/or residing in Sunshine Coast LGA:	8
Business activities, and proportion of services performed in the Sunshine Coast LGA:	Refer to Appendix D of PwC's response provides a list of engagements which PwC is either currently engaged on or has recently completed within the last three years.

Provide details of how your business currently contributes, or will contribute, to employment generation and future growth within the Sunshine Coast LGA.

This may include but is not limited to:

- New employees required for the Contract;
- Temporary labour hire arrangements;
- Incorporation of employment opportunities for vulnerable groups (for example Indigenous, long term unemployed, people with a disability or mental illness, disengaged youth and the aged) within the community;
- Training and skills development initiatives, apprenticeships, school based apprenticeships and or Cadet placements, work experience etc;
- Partnerships with TAFE, Universities.

PwC's Skills for Australia was appointed by the Federal Government to help ensure the nation's Vocational Education and Training (VET) system providing Australians with the skills they need to obtain lifelong, meaningful employment.

As a Skills Service Organisation, our role is to work directly with industry to identify skills and knowledge needs in the workforce and translate these into learning requirements in training products. By putting employers at the heart of the nation's qualifications and training system, we are helping to support Australia's continued global prosperity.

Provide details of how your business currently contributes, or will contribute, to local economic growth and provide sustainable economic benefits within the Sunshine Coast LGA.

PwC is committed to seeing Light Rail on the Sunshine Coast come to fruition. Through our past project experience, PwC knows firsthand, the economic development and growth that can occur as a result of implementing Light Rail, especially in a region which has strong population growth and amenity offering. We believe that delivery of an effective Business Case is best achieved with a relatively small advisory team that can build and foster relationships with relevant stakeholders. Due to the specialist skills required to deliver a defensible Business Case, PwC has selected a team with significant experience and existing working relationships which are not available within the Sunshine Coast LGA.

Through our international PwC network, we have access to the best practice methodologies and exposure to new trends supported through recognised research avenues and access to subject matter experts both nationally and globally. Accordingly, we will leverage this knowledge to assist Sunshine Coast Council realise its potential and identify the areas where opportunities may exist to provide a program for economic growth and the associated economic and financial benefits.