Officer: Nichola Jarvis
[redacted]

4 February 2026

Mr Mark Stephens
Senior Development Manager
Stockland Development Pty Ltd

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Dear Mark

Submission on Aura South Draft Public Environment Report

Thank you for the opportunity to provide feedback on the Aura South Draft Public Environment Report, prepared in accordance with the *Environment Protection and Biodiversity Conservation Act 1999*.

Sunshine Coast Council acknowledges the importance of collaborative, well-coordinated planning to support future population growth and housing supply. At the same time, the location and design of future development fronts must be carefully assessed to ensure the protection of the region's significant environmental values - particularly the Pumicestone Passage, which forms part of the Ramsar-listed Moreton Bay Marine Park.

While Council recognises the comprehensive information presented in the Draft Public Environment Report, our review has identified several matters requiring further consideration, and verification to provide confidence that matters of environmental significance will be effectively protected. Detailed comments and proposed solutions are provided in **Attachment 1** for Stockland's consideration in finalising the Public Environment Report.

Council looks forward to continued collaboration with the Commonwealth and Queensland Governments and Stockland to achieve optimal outcomes in planning for a sustainable Sunshine Coast. Council officers are available to discuss or clarify any

aspect of this submission. In this regard, please contact Nichola Jarvis on [redacted]

Yours sincerely

John Baker
CHIEF EXECUTIVE OFFICER

cc. Mayor & Councillors, Sunshine Coast Council
Debra Robinson, Director Sustainable Growth and Planning, Sunshine Coast Council
Nichola Jarvis, Manager Urban Growth Projects, Sunshine Coast Council

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Attachment 1 - Council Submission on the Aura South Public Environment Report.

Attachment 1
Sunshine Coast Council Submission on the Aura South Public Environment Report

This document sets out Council officer's preliminary technical comments in response to the Draft Public Environment Report for Aura South released by Stockland Development Pty Limited for public submissions in February 2026. The comments do not reflect Council's endorsed policy position in relation to the suitability of the Aura South area for future urban development.

Key Comments

No.	PER Section/s	Issue	Comment	Proposed Solution
1	Chapter 2 Structure Plan Vision and Approach	Overstatement of environmental areas	The 158ha sub-area of 'Environmental and buffer areas - other' seems to include limited actual environmental areas (based on Appendix 2.1 - only 32ha within the proposed Green Heart that 'supports native species' and about 2ha of wallum sedge frog non-breeding habitat within the southern 300m buffer to the Pumicestone National Park). For the remaining areas, presumed to be the balance of about 124ha of the 'Recreation and Environmental Transition' area in the Environmental and Buffer Areas Plan', it is unclear what their primary purpose is and what sort of environmental values they will retain.	Provide clearer separation of data on the roles and anticipated values of different zones within the 'Environmental and buffer areas – other'.
2	Chapter 3 Feasible Alternatives	Land supply modelling and feasible alternatives assessment compromised by omission of Proposed Sunshine Coast Planning Scheme	The Public Environment Reports feasible alternatives analysis relies on short-term approval data and broad statements about regional land shortages. It does not incorporate the Proposed Sunshine Coast Planning Scheme (that was subject to formal community consultation between July and September 2025), which aligns local strategic planning with the ShapingSEQ South East Queensland Regional Plan 2023 (ShapingSEQ 2023) and provides a contemporary land use, density and supply framework to 2046 (including 84,000 dwellings and 219,000 people between 2021 and 2046 for the Sunshine Coast). The omission of the Proposed Sunshine Coast Planning Scheme results in a feasible alternative assessment that does not reflect the zoning, density settings or growth management framework for the Sunshine Coast to 2046. As a result, the comparative analysis of the Do-Nothing, 70:30, 60:40 and 50:50 scenarios is based on incomplete and outdated policy assumptions.	Update the land supply modelling and feasible alternative assessment using inputs calibrated to the Proposed Sunshine Coast Planning Scheme, with transparent assumptions and sensitivity testing to demonstrate robustness.

No.	PER Section/s	Issue	Comment	Proposed Solution
3	Chapter 3 Feasible Alternatives	Omission of Council's long-term growth strategy for the Beerwah East SEQ Development Area	The Beerwah East SEQ Development Area remains a strategic priority for the Sunshine Coast Council in managing long term growth (as reflected in the Proposed Sunshine Coast Planning Scheme and ShapingSEQ 2023). It provides a significant residential land supply for the northern region and is strategically integrated with the proposed Direct Sunshine Coast Rail Line (The Wave). It also contributes significantly to the region's industrial land supply in proximity to the Bruce Highway, providing connections to major freight hubs. The Public Environment Report does not recognise these strategic policy settings.	Explicitly address Beerwah East's strategic role in meeting long-term residential and industrial land supply, its integration with future rail infrastructure and its relevance to the assessment of feasible alternatives.
4	Chapter 3 Feasible Alternatives	Failure to consider that the Halls Creek Potential Future Growth Area is located within the Regional Inter-Urban Break	It is acknowledged that the Halls Creek Potential Future Growth Area is located outside of the ShapingSEQ 2023 Northern Inter-Urban Break. However, the Halls Creek Potential Future Growth Area is wholly located within the Regional Inter-Urban Break (RIUB) under both the Sunshine Coast Planning Scheme 2014 and the Proposed Sunshine Coast Planning Scheme. The Regional Inter-Urban Break forms a critical component of the regions green frame that plays an important role in: • protecting high-value environmental assets, including the internationally recognised Ramsar protected Pumicestone Passage and the National Heritage listed Glass House Mountains • providing recreational, tourism, cultural and scenic values • protecting agricultural lands and food production capacity • reducing long-term community infrastructure and water-quality management costs.	The Public Environment Report should be amended to demonstrate how the Regional Inter-Urban Break (as identified in Council's current and proposed planning schemes) has been considered in the assessment of feasible alternatives.
5	Chapter 4 Description of the Environment	Further information about local ecosystem functions available	Despite current grazing activities and periodic slashing across large areas of the site that were historically cleared and drained, those areas have persistently high vegetation cover and continue to provide high, albeit non-pristine, ecosystem services. Council has previously engaged the University of the Sunshine Coast to assess and map ecosystem services across the Sunshine Coast region. In addition to the wide range of 'high-value' functions provided by the remnant habitats on the site, the mapping shows that the historically cleared and drained and ongoing slashed areas of the site still provide some high-value functions including: soil formation, soil retention, supporting habitats and waste treatment.	Augment the description of the existing physical environment and its values to strengthen the recognition of the site's ecosystem services through using the Ecosystem Functions Mapping Tool, to better meet 2 (b) of the Public Environment Report Guidelines (see https://www.arcgis.com/apps/webappviewer/index.html?id=2f71820453724def853a6139b8c17fc0&extent=17037807.0182%2C-3086858.2339%2C17045259.6284%2C-3082572.983%2C102100).

No.	PER Section/s	Issue	Comment	Proposed Solution
6	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Additional details and measures are needed for management of water quality during the construction phase of the development	High efficiency sediment (HES) basins and secondary erosion control measures within waterways downstream of the basins are proposed to control overflows. While the HES basins have been effective at Aura, additional measures to prevent and minimise erosion would also be needed on site to be consistent with the State Planning Policy (SPP). An understanding of what will be required to be detailed in future construction environmental management plans (CEMPs) such as certification, auditing, monitoring, adaptive management and integration with WSUD measures, should be provided.	Provide further details of: • Objectives • additional measures to prevent and minimise erosion to meet SPP standards • what is required to be documented for erosion and sediment control management in future CEMPs to ensure that best practice is adopted
7	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Additional details and consideration of further measures needed for management of water quality during the operational phase of the development	Details of the MUSIC modelling provided are insufficient, with no details of catchment areas, catchment plans and model assumptions (which reference to previous reporting for Aura). The lack of detail provided limits confidence in the conclusions of the modelling and the ability of future modelling to be consistent with this report. In turn, this limits confidence in the assessment in Chapter 12 of "low residual impact" on water quality for receiving waters on site and in the adjoining Ramsar site immediately downstream. The MUSIC and water balance modelling is reliant on the lake and stormwater harvesting from the lake. SCC does not allow for stormwater treatment within a lake to be included in treatment trains. The use of stormwater from the lake will require further analysis. The feasibility of this system, and its potential adoption, should not be relied upon for stormwater quality treatment. No specific stormwater treatment is outlined for industrial and commercial sites, with reliance instead on end-of-line stormwater treatment. These sites can pose high risks to downstream water quality and may require more targeted treatment. No explanation has been provided as to why the current approach at Aura of providing combined bio-retention and wetlands has not been proposed for this development.	Provide further details of the MUSIC model set up and assumptions that allow for effective assessment. Undertake sensitivity assessment to determine size of treatment measures required if rainwater tanks and stormwater harvesting are not adopted. Exclude the lake as a treatment node in the modelling. Explain why combined wetlands and bio-retention basins have not been proposed Undertake further analysis of reliability and potential uses of stormwater harvesting to determine optimal set-up. Provide further details of specific stormwater treatment for high risk sites.

No.	PER Section/s	Issue	Comment	Proposed Solution
8	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Insufficient consideration of local issues in assessment of flood impacts and flood immunity for the proposed development	The Proposed Action has not refined the regional flood model to enable the site to be modelled in detail. As a result, there is a lack of confidence that the proposed development has been provided with sufficient flood immunity and has managed potential offsite impacts. Severe storm requirements should also be considered. The differences in hydrology resulting from development of the site have not been included in the flood modelling. Drainage paths connecting the site to Bell Creek (near the intersection of Bells Creek Road and Tweedale Road) and flow paths draining from Bells Creek Arterial Road have not been included in the model. The potential flood impacts of the Proposed Action have therefore not been adequately determined. The focus on regional flooding has potentially overestimated the development potential of the site, as local overland flooding is likely to control flood levels and minimum lot level requirements for areas of the site.	Undertake refined flood modelling and additional sensitivity analysis to ensure that flood impacts on downstream water quality and habitats are adequately modelled and that sufficient flood immunity for the proposed development is provided.
9	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Climate change consideration lacking within the Water Balance Assessment and Ground Water Assessment	The anticipated impacts of climate change are that there will be longer dry periods interrupted by storm events with increased intensity. The likely influences of climate change have not been considered in the site water balance assessment or the groundwater assessment. Methods for consideration were subjects of papers at the recent Hydrology and Water Resources Symposium (Eng Aust, 2025).	Include additional detail on the climate change influences on the site water balance, groundwater and the proposed stormwater harvesting system.
10	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	High Ecological Value waters not referenced	Bells Creek and Halls Creek at and adjacent to the site boundaries are mapped by the State as High Ecological Value waters, indicating higher standards for water quality protection.	Ensure this status is reflected in Table 7.1 and text, where relevant.
11	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Stormwater treatment network detail lacking or inaccurate	The Table of Uses and Figure 2 (Summary document) show 598ha for development uses and 116ha for green spaces, including 8.5 hectares of lakes, wetlands, stormwater treatment zones retention ponds bioswales. Chapter 7 refers to Halls and Coochin Creeks bioretention are being 2.5% and 3% of contributing catchment area, respectively. Using the lower figure of 2.5%, this equates to 14.95 hectares of bioretention, excluding lake area, suggesting it is not adequate to meet the stated target. There may be an error or omission which may lead to confusion.	Clarify and provide details on catchment areas and the role of respective bioretention and other treatment devices within the Public Environment Report.

No.	PER Section/s	Issue	Comment	Proposed Solution
12	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Constructed lake and stormwater harvesting detail lacking	There is insufficient detail on the dimensions of the lake or other conceptual design considerations including retention time, purpose outside of stormwater harvesting, detention above normal water level, or whether recirculation through constructed treatment wetlands or bioretention may be required to avoid cyanobacterial blooms and other water quality issues. These are important considerations into the lake's medium to long-term viability as large freshwater lakes (with respect to their catchment) can be problematic with respect to performance and reasonable servicing needs. While stormwater inflows to the lake are treated by bioretention systems, this treatment should achieve objectives in line with the lake's status as a receiving environment - large subtropical freshwater lakes are not an efficient or reliable treatment device.	Include more detail about the design and function of the proposed lake, noting that it is Sunshine Coast Council policy that 'new constructed waterbodies are avoided unless an overriding need in the public interest is demonstrated.
13	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Potentially better options for managing runoff quantity not considered	The Proposed Action relies upon stormwater harvesting from the lake and rainwater harvesting from detached dwellings to manage changes in runoff quantity. The Proposed Action is also proposing denser styles of development than previously delivered at Aura. However, denser development does not necessitate higher fraction impervious values. A fraction impervious value of 90% has been assumed for water balance modelling for high density residential areas. Values of 60% have been assumed for low density residential areas, although this is less than what has been observed for previous stages of Aura. Water sensitive development which minimises impervious surfaces can provide multiple benefits. Council is concerned that the focus is on end-of-line stormwater treatment, and alternative measures to manage stormwater runoff, such as porous pavements, passive irrigation and green roofs have not been considered or detailed in this report, therefore raising concerns that these initiatives will not be adopted during detailed design. Higher density styles of development provide opportunities for additional controls and management of stormwater runoff than is possible for detached dwellings, and if managed appropriately can result in less runoff and pollutants than current styles of low-density residential development in Aura.	Test the sensitivity of the water balance and water quality modelling to assess a range of impervious values and stormwater treatment measures to determine if different controls and stormwater treatment options are more appropriate for the site. Assess potential benefits of additional measures to incentivise water sensitive styles of development.

No.	PER Section/s	Issue	Comment	Proposed Solution
14	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Inconsistency and errors in the assessment and reporting of potential groundwater impacts	There are discrepancies in different sections of the report between recorded and modelled groundwater levels. Errors in axis labels and figures have made it difficult to analyse results due to inconsistent data. For example, the modelled groundwater levels in Section 7-11 for the existing case show levels lower than -3m AHD in wet years, but this level was not shown to be recorded over 18 months at any of the bores (Figure 7-21). There is limited explanation of what has been recorded and/or modelled on site. Based on inconsistencies there is a lack of confidence in the results of the groundwater modelling. It is unclear where the boundary conditions used in groundwater modelling are located and whether the potential impact of climate change on groundwater levels has been considered.	Review input data and results of modelling to ensure that modelling is representative of the site, reflect results in the report and include additional details of assumptions used in modelling.
15	Chapter 7 Impact Assessment - Water Quality and Quantity Investigations	Inconsistency between Flood Model assumptions and the State Government long term intent for Bribie Island	The flood model assumes breakout over Bribie Island (that is, that flows exiting the Proposed Action are not constrained by the Bribie Island landform). This is conceptually at odds with the State Government commitment to Bribie Island continuing to provide protection from Coastal Hazards. Presumably, the protective measures to be provided for Diamond Head and Golden Beach would need continuous connection to southern landmass of Bribie Island. If floodwater cannot break over Bribie Island, this may change the flooding and hydraulic characteristics on the site and how these affect identified Threatened Ecological Communities and the Moreton Bay Ramsar Site.	Revise the flood modelling assessment based on assumptions that are consistent with the State Government's long-term intent for Bribie Island as an offshore protection measure for coastal hazards (including under future climate conditions).
16	Chapter 8 Impact Assessment – Flora Species	Post-construction mitigation measures for ongoing anthropogenic impacts not provided	The listed mitigation measures in Table 8-20 Mitigation Measures for MNES Flora only refer to construction-period mitigation action.	Include post-construction mitigation measures for ongoing anthropogenic impacts such as increased recreational use.
17	Chapter 8 Impact Assessment – Flora Species	Inconsistency between statements in 'Key findings' and chapter details	Chapter 8 (p19) states that the 'Proposed Action is likely to result in better outcomes for MNES flora than not undertaking the development which would likely allow pine wildlings to re-establish'. This is contradicted by statement on p74 that "impacts of these changes [do nothing approach] on habitat conditions for MNES flora are hard to predict and likely to be mixed", and also by the mixed outcomes stated in 'Table 8-19: Species Specific Impacts and Considerations without the Proposed Action'.	Amend text on p19 to better reflect expected 'do nothing' outcomes discussed in later sections of Chapter 8.

No.	PER Section/s	Issue	Comment	Proposed Solution
18	Chapter 9 Impact Assessment – Fauna Species and Populations	Insufficient consideration of sea level rise implications and options to mitigate impacts on water mouse	The National Recovery Plan for Water Mouse (DCCEEW, 2022b) states that 'the water mouse is known to decline in areas adjacent to development (Section 4.1). A development-free buffer zone of at least 200 m is required around water mouse habitat at locations under pressure (Section 4.12) to mitigate against declines. A larger buffer zone is required on the landward side in locations that are predicted to be under pressure in the future (Section 5.2.2) as sea levels rise and coastal habitats migrate inland with climate change (Traill et al. 2011). The required buffer distance will depend on terrain and sea-level rise predictions. The aim of the water mouse recovery plan is to implement actions that will reduce the impact of the primary known threat to water mouse, which is coastal development. As a result of the Proposed Action, the identified Water Mouse habitat will be located close to the development. The National Recovery Plan for Water Mouse identifies the Pumicestone Passage as a location (population) under pressure for water mouse due to a recent and significant expansion of the Caloundra urban footprint.	Further options should be considered to address the intent of the National Recovery Plan for Water Mouse, including maintenance of an appropriate development-free buffer zone for water mouse habitat now and in the future, allowing for migration of coastal habitats with sea level rise.
19	Chapter 9 Impact Assessment – Fauna Species and Populations	Potential impacts on water mouse habitat from increased recreational use not acknowledged	Pg 191 - states "Further, Stockland is not proposing or supporting any expansion or improvement to the existing boat ramp on Bells Creek which is located next to known nesting and foraging grounds for this species. In this way the risk and likelihood of negative human interactions with the species and particularly its nesting habitat will be reduced. The Aura South development will likely result in a significant increase in the volume of waterway recreational access from new residents. This is backed up by this statement on Pg 200 "However, the incoming population may contribute to a cumulative demand for recreational boat infrastructure, along with its associated environmental effects.	The Public Environment Report should reflect the risks to MNES associated with significant extra visitor access to sites and waterways.

No.	PER Section/s	Issue	Comment	Proposed Solution
20	Chapter 11 Impact Assessment Wallum Sedge Frog	Cumulative impacts, competitor pressure from Eastern Sedgefrog (*Litoria fallax*), and predator impacts not fully addressed	Given regional development pressures and known stressors for Wallum Sedgefrog, cumulative impacts (hydrology, nutrient runoff, noise/light) should be explicitly evaluated. Recent research highlights distributional overlap and competitive displacement risk from L. fallax in disturbed wallum systems; this pressure should be analysed with specific site controls. The Public Environment Report does not provide sufficient assessment of Gambusia holbrooki (mosquitofish) or similar introduced aquatic predators that pose recognised risks to Wallum Sedgefrog populations. Mosquitofish are documented predators of eggs and larvae of the Wallum Sedgefrog, with the national recovery plan identifying Gambusia as a key threat requiring management. This should also include other aquatic predators (crayfish, aquatic beetles, prawns, fishing spiders, certain fish species).	Add a cumulative impact analysis incorporating nearby activities, land use changes, and infrastructure to assess cumulative risk residual impacts. Include a competitor risk module and habitat design to maintain low nutrient, low pH conditions, minimise edge disturbance, and monitor L. fallax occupancy. Conduct a dedicated predator risk assessment and integrate predator considerations into wetland/waterbody design. Identify the need to develop a predator management plan.
21	Chapter 12. Impact Assessment - Aquatic Ecology	Potential underestimation of residual risks from altered water quality	Residual Risks to water quality of receiving environments, including the onsite TEC and adjacent Ramsar habitats, could be higher than assessed in this chapter, based on limitations of the modelling noted in the separate comment on Chapter 7 – Water Quality and Quantity Investigations (Issue: Management of water quality during the operational phase of the development).	Implement recommended solutions to modelling issues raised in relation to Chapter 7 and re-assess residual risks to water quality for onsite and downstream waterways and wetlands.
22	Chapter 13 Impact Assessment - Threatened Ecological Community	Excessive waterlogging of the coastal swamp Threatened Ecological Communities	A range of predicted hydrological impacts from the proposed development are documented, despite the proposed mitigation strategies. These include increased time of inundation of the wetland, increased water depths, reduced area suitable for groundcover species, shrubs and reeds, and raising groundwater levels across notable areas of the existing Threatened Ecological Communities. It is considered that some of these predicted impacts exceed the authors' no-impact criteria and collectively indicate that the proposed development may have notable impacts on the character of the existing wetlands, including a potential shift from forest-dominated to reed/sedgelands due to the increased and sustained waterlogging that is predicted. The former forestry road across Halls Creek at the site boundary (referred to in the Public Environment Report as a 'bund') currently presents a partial flow barrier that will potentially exacerbate the predicted increased waterlogging if retained.	Undertake a detailed analysis of the alternative option of re-establishing the original natural hydrological connection between the onsite creek and wetland and the creek and wetlands downstream, specifically, removing a section of the old forestry road at the creek crossing. (the "bund'). This analysis should have reference to the impact on matters of environmental significance within and adjacent to the site in the short, medium and long-term of both options, incorporating future sea-level predictions.

No.	PER Section/s	Issue	Comment	Proposed Solution
23	Chapter 13 - Impact Assessment - Threatened Ecological Community	Future impacts and lost opportunities from proposed retention of old forestry road at downstream boundary	Based on State mapping, a large area in the centre of the site that includes the current Coastal Swamp Threatened Ecological Communities and other lowlands, is in the Permanent Tidal Inundation Area (HAT at 2100). If the downstream bund is retained, with or without tidal gates, rising tidal waters downstream may eventually compromise the current drainage of Halls Creek and the Threatened Ecological Communities, potentially adding to the artificially higher waterlogging of the existing site. With deeper and permanent waterlogging, the Threatened Ecological Communities may be lost across all or most of its current extent, and there will be limited possibility of tidal habitats, including downstream Coastal Oak and Saltmarsh Threatened Ecological Communities, from naturally migrating into the site.	The Nature Strategy for the site should specifically address the long-term transition, under changing climate condition, of the site and short to long term benefits for multiple Threatened Ecological Communities and other habitats within and downstream of the site. The strategy should consider re-establishment of natural, unregulated outflows from the on-site wetlands and Halls Creek, that would allow natural tidal inflows to spread naturally into the site over time with sea level rise and accommodate migration of the existing Threatened Ecological Communities into adjoining low areas.
24	Chapter 13 Impact Assessment - Threatened Ecological Community	Impacts on off-site Threatened Ecological Communities not assessed	The Public Environment Report identifies and maps other Threatened Ecological Communities - Coastal Oak and Subtropical Saltmarsh in close proximity to the site downstream. Those communities will be affected in the short term by various impacts from the proposal, most clearly the predicted increased volumes of runoff from the development footprint, including through direct pumping of stormwater into the downstream area. Downstream Threatened Ecological Communities will also be affected in the longer term as the sea level rises, by preventing those communities from migrating landwards as could happen naturally without large-scale conversion of currently pervious lands to intensive development.	Undertake assessment of impacts on the additional Threatened Ecological Communities - coastal oak and saltmarsh - that will be affected by the proposal. Consistent with the comment above (Issue: Future impacts and lost opportunities from proposed retention of old forestry road at downstream boundary), consider mitigation of longer-term, sea level-related impacts by implementing a holistic, transition-based conservation and ecological restoration plan.
25	Chapter 15 Impact Assessment - Recreation and Culture	Insufficient assessment of recreational activities and potential impacts for the Inter Urban Break	The recreation activities analysed in the report do not cover the full breadth of nature-based recreation activities undertaken on land and water surrounding the development. Council's Inter-urban Break Outdoor Recreation Plan contains a full analysis of recreation activities undertaken in this area and should be used as the basis for an analysis of impacts on/from recreation. Key findings - "There will be no direct impacts to the Moreton Bary Ramsar Site as a result of recreation and culture associated with the Proposed Action" - This is unlikely as placing an additional 30,000 to 35,000 people in this area will significantly increase the use of the Moreton Bay Ramsar Site and surrounding state forests for recreation activities, leading to potential impacts identified; • Increased recreational fishing and reduced fish abundance (Section 15.6, Chapter Summary + Summary & Conclusions) • Boat/PWC wake causing bank erosion and habitat degradation (Section 15.6.2, 15.6.3) • Noise impacts on marine fauna (Section 15.0 Chapter Summary) • Impacts to culturally significant species and practices (Section 15.7)	Include reference to the Inter-urban Break Outdoor Recreation Plan (IUB ORP) (inc. in 15.2.1.4) and include a summary and full list of recreation activities undertaken in the Inter-urban break. (Visitation and participation data used to develop the IUB ORP can be made available.) Include an analysis of how the proposed development will / will not impact nature-based recreation pursuits which rely on a natural setting (e.g. bird watching). Identify linkages and explain risk ratings for recreational pressures on ecological and social values.

No.	PER Section/s	Issue	Comment	Proposed Solution
26	Chapter 15 Impact Assessment - Recreation and Culture	Need to mitigate impacts on Traditional Owners.	The impacts on Traditional Owners are described as low residual risk including: • Disturbance to culturally important species • Interference with hunting, fishing, crabbing rights • Reduced sense of place and wellbeing • Increased feelings of powerlessness	The impact assessment should be Traditional Owner-led with regard to the cultural assessment section. An exercise in cultural use mapping should be undertaken to identify zones of cultural activity (fishing, crabbing, ceremony, story places), assess need for cultural protections (such as no-go zones or seasonal closures) and to inform cultural visitor protocols.
27	Volume 4, Appendix 2.1. Aura South Nature Strategy	Overstatement of the distance from developable area to the Pumicestone Passage	In the overview of Initiative 6, it is stated that the Aura South developable area is 3km west of Pumicestone Passage. However, even allowing for the proposed 300m buffer from the Pumicestone National Park, the developable area is only about 2.5km from subtidal (waterbody) areas of the Pumicestone Passage to the west, only about 1.5km from subtidal areas to the south and <1km from intertidal (mangrove/saltmarsh) areas of Halls Creek within the Ramsar site extent.	Amend references to the development site or developable area being 3km from the Pumicestone Passage in this and other sections of the public Environment Report. Replace the reference with the nearest distance to the Pumicestone Passage (approximately 1.5km to the south) OR the distance (<1km) from the nearest part of the Ramsar site.
28	Volume 6, Appendix 22.1	Underestimation of household occupancy rate and population forecast	The demographics of the Golden Beach/Pelican Waters and Beerwah communities are significantly different compared with the emerging Caloundra South community. The assumed household occupancy rate of 2.46 for Aura South, resulting in a population forecast of 29,520 people, is considered very conservative, being below the SEQ (2.55) average and not reflecting the demographic profile of greenfield areas and the Aura South aspiration for intergenerational living. In the 2021 census, localities within the Caloundra South Priority Development Area had an occupancy rate of circa 2.9. A higher population would have greater needs for recreation and social networks, which could affect the assumptions around urban settlement patterns and environmental transition zones.	Revise the household occupancy rates and forecast population for Aura South upwards with consideration to trends observed in Caloundra South Priority Development Area and other greenfield areas.