

# *Development Watch Inc*

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31 March 2022

To: The Chief Executive Officer  
Sunshine Coast Regional Council  
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## SUNSHINE COAST PLANNING SCHEME REVIEW PRELIMINARY SUBMISSION

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Development Watch (DW) welcomes the Sunshine Coast Council's consultation with the community on the new Sunshine Coast Planning Scheme.

We note Council is conducting various surveys in relation to the new Scheme. Given the limited space for responses in the surveys and as our members are relying on us to represent them in the new Planning Scheme, DW provides the following preliminary submission for consideration when formulating the draft Planning Scheme.

On a viewing of the current Sunshine Coast Council (SCC) consultative documentation there appears to be an overt focus on growth and development. DW submits the primary focus should be on community and preserving the Sunshine Coast's natural attributes which provides a point of difference. The growth will then follow.

For the purposes of this submission DW notes Council's advice –

- “Low-rise” generally refers to buildings between 1 – 2 storeys in height.
  - “Low-medium rise” generally refers to buildings between 2 – 6 storeys in height.  
**Note:** the term “low-medium density” is also used in some proposed local plan areas. Areas identified for low-medium density development are generally intended to accommodate buildings up to 2 storeys in height, with potentially up to 3 storeys in discreet areas.
  - “High rise” generally refers to buildings over 6 storeys in height.
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## PART A:

### SUNSHINE COAST LAND USE PLANNING PROPOSAL 2041

Since the launch of the existing Planning Scheme in 2014, we have heard a lot from the Mayor that a Planning Scheme is a living document which strongly suggests that it can be changed on a whim. With every Amendment of a new Planning Scheme and every declaration of a PDA area, certainty for the community is removed. The Planning Scheme should be "bankable" by residents and the investment sector. We should only see minor amendments and even then these should be supported by the community. Residents make investment decisions based on where they live, work and play. Residents therefore need "security of tenure" as much as, if not more than, the development industry.

DW therefore respectfully submits that Council needs to make overt statements to residents, owners, and investors etc. These statements should reinforce that any Planning Scheme as agreed between Council and the community, supports community now and in the future, respects diversity and in the case of the Sunshine Coast, embraces the concept of a community of communities with each community/town/village/location being able to have and maintain a unique identity.

This document would also benefit from a set of "Values" (like any organisational strategic plan). These could include such things as – we have **integrity**, underpinned by **open communication**, **accountability** and **innovation**.

#### Part 1 – Proposed Vision and Regional Planning Directions

The SEQRP is the document that governs and determines "growth" for the Sunshine Coast and until updated figures from the Sensus have been released and the current SEQRP is reviewed, and Council's Economic Development Plan is updated, accurate figures on growth are not available. However, DW submits that with available land in the current Planning Scheme and SEQRP there is adequate development to meet the current future growth on the Sunshine Coast until 2041.

Lifestyle and liveability are two of the main attributes of the Sunshine Coast that attract growth. If you have a connected community with a sustainable and healthy environment and provide a point of difference to other tourist areas, economic growth will follow. For this reason, DW submits these dot points should be in this order -

- Community
- Connection
- Environment
- Economy
- Growth

## Part 2 – Proposed Local Planning directions - Coolum - Peregian

DW commends Council on its initiative in creating the Blue Heart project. In relation to the changes to the boundary of the Coolum LPA DW submits that the current status of the Blue Heart ie. a substantial portion is in the Coolum West rural area and Coolum and Yandina are the only access point to the Blue Heart. If Council wishes to have the Blue Heart as one, then it should be placed in the Coolum LPA. This is a project DW and its members have embraced and will go to extraordinary lengths to support Council in any expansion and/or in protecting it.

In the last paragraph under “**Description**” it refers to –

*“Opportunities for further growth and development...”. It identifies significant development sites as “the former golf course land at beachside Yaroomba and ....”.*

In relation to the beachside land at Yaroomba, DW has had to go to extraordinary lengths to defend the 2014 Planning Scheme. Certainty for the community was never provided under the 2014 Planning Scheme. It was only a few months after the 2014 Planning Scheme was launched that DW (and the community) had to start defending the 2014 Planning Scheme and it is still ongoing. Council should reinforce the final decision of the Court in the new Planning Scheme.

In the second last paragraph it states –

*“Some streets closest to the Coolum Town Centre have redeveloped over time to offer a greater range of housing types including well designed townhouses, duplexes and low-rise units.”*

DW submits that this redevelopment can continue without the need to increase building heights and density to medium density. There are many older single story houses close to the Coolum Town Centre.

DW also submits that a paragraph in relation to Coolum’s significant views from residences to be protected is warranted. Coolum is not flat. It has varying areas with views starting from Mount Coolum, Centenary Heights, Grandview through to the Coolum township itself. It also has views to the west over the rural land.

Coolum – Peregian - [Page 2 of 2 Proposed Planning Directions](#)

### **Dot point 4 – Investigate possible areas for additional low-medium density residential development close to the Coolum Town Centre to improve housing diversity**

Remove “medium” density.

### **Dot point 7 – Yaroomba Beach development site - await appeal outcome (Map Ref. 3)**

Yaroomba Beach development site. Any description here to re-enforce the final decision of the Court.

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## PART B:

### RESPONSE TO SURVEYS

#### REGIONAL PLANNING DIRECTIONS SURVEY

1. **Below is a proposed overall vision for the Sunshine Coast. How strongly do you agree with the proposed vision?**

In 2041, the Sunshine Coast is recognised as a desirable, liveable and sustainable place, where smart, healthy, and creative communities thrive in a well-defined, connected, and transit-oriented pattern of settlement, which is resilient to the changing environment.

AGREE

However, DW recommends these words be used in the first sentence... recognised as a “desirable, well designed, ecologically sustainable place...” – these words are used in Section 2 of the *Queensland Planning Act*. Also replace the word “smart” with “astute”.

2. **Of the planning topics listed below, which are most important to you?**

Protecting the natural environment and green spaces

Protecting our region’s resilience to climate change

Retaining local character

Maintaining building heights within set limits

Protecting scenic amenity and significant views

**The following statements are based on these proposed regional planning directions. Rate the statements below. If you don’t know, leave the question blank and skip to the next question.**

3. **Shaping sustainable growth**

**Clear boundaries should be set to define the extent of urban and rural residential development.** STRONGLY AGREE

**There should be a green frame around our urban and rural residential areas to clearly separate communities and protect our rural and natural landscapes.**  
STRONGLY AGREE

**There should be a range of housing options to assist affordable living.** AGREE

**There should be well designed mixed-use town centres that allow people to live, work and play.** AGREE

**Urban development should not expand into areas subject to unacceptable risks from natural hazards such as flood and landslide.** STRONGLY AGREE

**4. A smart economy**

**Economic growth and diversity should be facilitated.**

NEITHER AGREE NOR DISAGREE – DW would like the words “A smart” replaced with “An astute”.

**High value industries such as health, education, knowledge industries, tourism, sport and leisure, agribusiness , aviation and cleantech should continue to be supported.** AGREE though replace the words “A smart” with “An astute”...

**The ongoing viability of agriculture, forestry and fisheries should be supported.**  
AGREE

**The amount of regulation on business and industry should be minimised as much as possible.** STRONGLY DISAGREE

**5. A healthy and resilient environment**

**Natural habitat areas should be protected and restored.** STRONGLY AGREE

**Natural waterways and wetlands should mainly be preserved in their natural state.**  
STRONGLY AGREE

**Biodiversity in urban areas should be protected and enhanced.**  
STRONGLY AGREE

**The Sunshine Coast built environment should be resilient to natural hazards and climate change.** STRONGLY AGREE

**6. A strong and creative community of communities**

**The local character of our distinct towns, villages, suburbs and urban areas should be recognised.** STRONGLY AGREE

**Parks, open space and sport and recreation facilities should be well located and protected.** STRONGLY AGREE

**A strong position on the maximum height of buildings should be maintained.**  
STRONGLY AGREE

**Scenic landscapes and significant views should be protected.**  
STRONGLY AGREE

**Indigenous and non-indigenous cultural heritage should be protected.**  
STRONGLY AGREE

**Development should be designed to reflect the subtropical climate and character of the Sunshine Coast.** STRONGLY AGREE

**Our urban areas should have high quality landscaping creating green, comfortable and shaded spaces.** STRONGLY AGREE

**7. Connected people and places**

**Development should prioritise and promote active transport such as walking and cycling.** STRONGLY AGREE

**Planning for the Sunshine Coast should seek to reduce private car use over time.** STRONGLY AGREE

**High frequency public transport should connect our growing communities.** AGREE

**Development should provide for digital infrastructure and communications technology, supporting businesses and employees and allowing more choice in where they locate.** AGREE

**8. Is anything missing? Do you have any general comments about the proposed vision and regional planning directions for the Sunshine Coast?**

“Sustainable growth” used here is an oxi-moron. The term “ecologically sustainable development” should be used. This term is used throughout the world and a definition appears in the *Queensland Planning Act 2016 Section 2*.

**9. Map of proposed regional planning directions. Below is a proposed settlement pattern map that shows some of the proposed regional planning directions. Do you have any comments about the proposed settlement pattern?**

DW requests that the Blue Heart be part of the Coolum Local Plan Area

**10. Other comments**

Do you have any other comments about land use planning and development on the Sunshine Coast that may help us in preparing the new planning scheme?

DW would like more focus on the Sunshine Coast’s natural advantage and attributes not only in the rural areas but also in the coastal areas. Such attributes will provide a point of difference to the Gold Coast.

**11. Age** Not applicable

**12. Gender** Not applicable

**13. What is your postcode** 4573

**14. Development Watch has been operating for over 15 years**

**15. Do you wish to identify with any of the groups below?**

Residents action group/community group

**16. Email address [president@developmentwatch.org.au](mailto:president@developmentwatch.org.au)**

## **LOCAL PLANNING DIRECTIONS SURVEY**

### **Coolum Local Plan Area**

- 1.a. **No or minimal change in maximum allowable building heights.**  
WE STRONGLY AGREE
- 1.b. **Retain large urban lot sizes to preserve local character.**  
WE STRONGLY AGREE
- 2.a. **No or minimal change to growth management boundaries (ie. urban areas are not further expanded)**  
WE STRONGLY AGREE
- 2.b. **Investigate possible areas for additional low-medium density residential development (such as duplexes and townhouses) close to the Coolum Town Centre to improve housing diversity**  
WE STRONGLY DISAGREE
- 3.a. **Retain and strengthen the existing intent for the Palmer Coolum Resort site to remain as a golf course and tourist accommodation**  
WE STRONGLY AGREE.
- 3.b. **Investigate options to allow limited indoor sport and recreation uses in the Quanda Road industrial area, where such uses do not alienate the future use of premises for industrial purposes**  
WE AGREE.
- 4.a. **Protect local coastal environmental and landscape features**  
WE STRONGLY AGREE
- 4.b. **Include new provisions to better protect sea turtle sensitive areas**  
WE STRONGLY AGREE
- 5.a. **Is there anything in this local area that you particularly value and want protected or enhanced in the planning scheme**

DW loves the 'Blue Heart' concept that involves managing and protecting the flood plain in the Maroochy river catchment. The majority of the Blue Heart is part of the rural area known as Coolum West. The only access to the Blue Heart is via the Coolum West rural

area. It should remain here where people are passionate about the concept and can keep an eye on it and perhaps in the future get involved with it on a volunteer basis.

**6. What types of development would you like to see encouraged or supported in this local area?**

- Sporting venues and/or facilities for the Olympic games provided they are in areas where the residents and visitors won't be adversely impacted. Eco-tourism which genuinely meets the criteria for eco-tourism, including minimising social and environmental impacts and cultural awareness and respect. Eco-tourism here must retain our point-of-difference from Gold Coast style tourism development.
- Additional bike paths, walking tracks.
- There is still opportunity for duplexes and townhouses in the Coolum Town Centre without increasing building heights to medium density.

**7. Is there anything missing, or do you have any other comments about planning for the future of this local area that you would like to add?**

- A park and ride facility on the TMR land south-east of the Coolum roundabout. This could include a stop for express buses and a rest stop with access to Coolum Park Shopping Centre.
- A footbridge over Stumers Creek between the easement at Springfield Avenue to the Coolum Sports facility. This would greatly enhance pedestrian and cyclist access to the sports facility.
- A high priority assigned to the construction of the South Coolum Road link to Suncoast Beach Drive.
- If a tourism facility is deemed appropriate for the Sekisui land, then that facility should be protected in a similar fashion to that of the Palmer Coolum Resort. A specific zone for tourism assets should be considered.
- There are some magnificent trees on State owned land in Tritonia Drive, Coolum Beach. The Police Dog Squad currently occupy the site. In the event this site is vacated and the land is sold, we would like these trees protected.

## **HOT PLANNING TOPICS SURVEY**

### **Affordable Living and Housing Affordability**

DW acknowledges there is a shortage of affordable housing. However, given the recent substantial rise in land and house prices in the Coolum area, affordable housing is not realistic in the Coolum LPA. Council should investigate areas where land is affordable and affordable housing can be provided.

### **Carparking**

As was once the case, Council should ensure adequate parking is provided with every development whether it be residential units, duplexes, secondary dwellings or commercial

properties. Insufficient parking not only disadvantages Coolum residents and tourists but also small businesses. Any moneys paid in lieu of carparking should be spent by Council on improving carparking in the area for which it was contributed.

### **Climate Change**

DW agrees Climate Change needs to be considered carefully and integrated into the new Planning Scheme as an overlay. Areas affected would be bushfire hazard areas, floodplains and areas bordering or in close proximity to tidal rivers and on the seashore.

### **Design of multiple dwellings**

DW is not sure how Council can control the design of private developments, however, it can control the overall footprint and allowances on setbacks which contributes to the overall image and impact on surrounding areas.

### **Dual Occupancies and Secondary Dwellings**

The approval of these is administered by Private Certifiers some of whom use very liberal interpretations of the allowable Performance Outcomes in the Dwelling Code. Could the Performance Outcomes be redrafted to reduce unreasonable flexibility? Perhaps the Allowable Outcomes become mandatory minimums where Dual Occupancies and Secondary Dwellings are proposed?

DW agrees some dual occupancies and secondary dwellings are poorly designed and are having a negative impact on the character and streetscape of residential neighbourhoods.

Secondary dwellings should provide off-street carparking.

Given the minimum lot size for a secondary dwelling is 600sqm no relaxation on setbacks should be permitted.

Review provisions in the new planning scheme relating to dual occupancies and secondary dwellings, including design and siting requirements.

### **Service Stations**

Under State rules, construction of service stations is an ENVIRONMENTALLY RELEVANT ACTIVITY. Those with small tank capacities are exempt from impact assessment. DW submits they should not be.

Services stations should, by their very nature, be impact assessable. There have been many service stations approved north of the Maroochy River in the past 6 or 7 years, some of which have not been constructed.

It is well known developers like to construct service stations near schools because they often have fast food outlets attached. DW objects to this blatant lure of school children into fast food outlets as they pass by on their way to and from school. Child obesity is a major problem in Australia and the problem does not need to be exacerbated by providing fast food outlets near schools.

Service stations have constant traffic accessing and exiting and this creates a safety issue when constructing service stations near schools as well as exacerbates traffic congestion.

Service stations can create noise, light and odour.

Finally, service stations should have to provide an Environmental Assessment if they are located near a National Park and/or creeks, drains etc.

Could Council please liaise with the State on this matter in order to have the State rules changed.

### **Short-term accommodation**

DW submits the SCC should adopt similar rules to that of the Noosa Council in relation to short term accommodation.

There are three categories to properties which are let short-term:

1. Where the entire property is let and is managed by the owner living in the area and/or a letting agent;
2. Where the entire property is let with no letting agent and the owner does not live in the area; and
3. Where the property such as a studio, bungalow etc is located on the site of a house occupied by the owner.

In relation to categories 1 and 2, DW believes property owners must live within a short distance to the property. If not, they must have a letting agent. The property owner and/or letting agent must have a 24 hour emergency line available for neighbouring residents when issues arise.

In relation to category 3, owners must warrant that they will be on-site when any studio, bungalow is let and they are responsible for ensuring the behaviour of the tenants.

Finally, DW believes some tourist accommodation should be designated as tourist accommodation only and/or permanent tenants only. The two do not mix and often create problems.

### **Uses in rural areas**

DW supports agri-business on rural land. In this regard a separate zoning for this needs to be established and should contain such things as the percentage of the rural land that can be used, no toilet/shower facilities near rivers, creeks, flooding, noise, carparking etc etc.

Having said that, DW also values large scale rural areas for agriculture. We would not want rural areas to become a dumping ground for uses of an excessive scale and intensity and inappropriate character. We do not want to kill the goose that laid the golden egg tourism wise.

DW would not want to see rural areas becoming dumping grounds for all sorts of uses that are of excessive scale and intensity and inappropriate character. The fact that the rural areas are a

destination for day trippers and tourists and campers and other short-stay accommodation is good but the extent of this must be limited or the areas will lose their rural aesthetic. We would be potentially killing the goose that laid the golden egg tourism industry wise.

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## PART C:

### ADDITIONAL COMMENTS

#### **Performance Outcomes**

DW submits more rigour needs to be brought to Performance Outcomes so they cannot be unreasonably exploited. Clear outcomes need to be set so that the community and the development industry are provided with certainty.

#### **Code vs Impact assessable**

The rules determining whether Applications are code assessable or impact assessable appear to be unreasonably biased in favour of allowing code assessment. Where an Application diverges

significantly from the Allowable Outcomes (say more than 10 per cent) it should automatically default to impact assessment. This gives the community a notification that a project which diverges from the Plan is being proposed and allows them the opportunity to object.

#### **Payments in lieu being locally and effectively applied**

DW submits that moneys paid in lieu of infrastructure such as carparks, footbridges, footpaths and the like should either be spent by Council on that infrastructure in that area and if not, should be spent in the Local Plan Area for which the moneys were paid.

#### **Definition of density and bedrooms**

The basic problems are that residential density limits set out in the Plan appear to be largely, if not totally ignored. As one of the Council Officers explained it – If you can fit the required car parking on the site then we give no more consideration to density limits. Then density assessments are derived from bedroom numbers – so the ‘astute’ define what are clearly second or third bedrooms as nebulous things like ‘multi-function space’.

Density is determined by counting the number of **bedrooms** in a dwelling and converting this to ‘equivalent dwellings’. The number of equivalent dwellings is then used to determine the density of a lot. A definition of ‘bedroom’ is not in the PS. However, Council does use the below definition for determining infrastructure charges.

*bedroom means an area of a building or structure which:  
a) is designed or intended for use for sleeping; or*

*b) can be used for sleeping such as a den, library, study, loft, media or home entertainment room, library, family or rumpus room or other similar space.*

This definition should be included in the new Planning Scheme.

### **Aggregation of Lots**

DW submits that to maintain Coolum's village atmosphere there needs to be a limit to the number of allotments that are able to be amalgamated. When lots are amalgamated minimum boundary setbacks should be increased by say 10% for each additional allotment. These setbacks should be mandatory and not able to be varied by applying Performance Outcome criteria?

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DW is very happy to meet with Council staff to discuss any matters outlined above. We wish you well in drafting the planning frameworks for the future to ensure the Sunshine Coast community is at the front and centre of the Plan.

Yours sincerely,



Lynette Saxton  
President, Development Watch Inc.

cc. Cr Suarez

cc. Cr O'Pray