



Development Watch

Sunshine Coast Planning Scheme Submission

19 September 2025

1.0 Background

Development Watch Inc. (DW) is a volunteer community group whose primary focus is advocating respect for the Sunshine Coast Planning Scheme in relation to the Coolumb and Northshore areas. Our constructive input has been provided freely, in consultation with our extensive membership and supporter base, to the various levels of government on specific projects and policy matters. Also when the need has arisen, DW has objected, on behalf of its membership, to inappropriate development that would conflict with the planning scheme or negatively impact on the community generally.

In this regard we thank Sunshine Coast Council for the opportunity to comment on the proposed Planning Scheme (PS) for the Sunshine Coast and thank them for their involvement and assistance in forums and information sessions in relation to the proposed new scheme.

It should be noted that the DW committee and its membership base, although not professional Town Planners, have had extensive experience in planning matters, community engagement and advocacy as well as policy development and implementation. We welcome the opportunity to provide constructive feedback on the proposed scheme.

2.0 Executive Summary

DW supports but with changes the current PS proposal. As with other community groups across the region, DW has concerns with a number of higher order issues relating to dwelling density and the lack of a yet to be delivered Local Government Infrastructure Plan (LGIP).

We would strongly encourage Council to engage in ongoing and meaningful consultation with the community particularly in relation to dwelling density, prior to submission of any revised draft of the PS to the State Government for final approval. This will enable the community to engage with and comment upon any further amendments made by Council after the current consultation phase has ended. Detailed comments by DW are listed below.

Specific Comments for Council and its officers to consider: -

3.0 Region as a whole

3.1 Vision

DW supports the “Vision” and fully endorses the concept that the Sunshine Coast is a “community of communities”, each having their own distinct character and ambition. Having a PS that embraces this concept and being supported by 18 distinct Local Plans is to be applauded.

Differentiation of these areas, both in terms of planning regimes, environmental management/climate mitigation and infrastructure provision is important to both residents and visitors and allows the Sunshine Coast to be seen as a unique destination to live and holiday within. It also provides more detail assessment benchmarks for development in the respective areas. The inclusion of precincts within the Local Plans further reinforces opportunities for community engagement and support.

DW fully endorses the “Community of Communities” approach within the PS.

3.2 Key Drivers of Density.

The current draft PS has identified a perceived need to substantially increase dwelling “buffers” over and above what we understand to be acceptable density requirements under the South East Queensland Regional Plan (SEQRP). Various methodology models can of course provide differing outcomes. However, for some areas of the Coast the Council based modelling (incorporating a time projection well beyond the time scale of the proposed plan) causes concern for some residents in relation to the future liveability of their communities.

DW recommends that Council considers these concerns with a view of reviewing downwards the dwelling targets for the Sunshine Coast generally and align requirements more in line with the SEQRP targets.

If Council was to acknowledge this concern, zoning allocations could then be revisited across some localities leading to a general reduction in scale, coverage and density impacts on these neighbourhoods. This issue is particularly relevant to the Maroochydore to Caloundra sub-region. Planning tools are available to Council to indicate to owners, residents and investors/developers that in the future some of these areas could be further investigated (with future community engagement), for increased densification (i.e. Areas of Investigation). In this way the proposed zoning for some areas could be down scaled now from “medium” density to “low to medium” density and “low to medium” density to “low density”. This approach allows Council to undertake a further review of zonings in a future scheme based on latest known facts including infrastructure provision, community expectations, dwelling innovation, social need, climate change considerations and the availability of funding for delivery of services.

This should not be seen as a push back on growth or the community adopting a NIMBY philosophy but a reflection of genuine concern that managed growth starts with an understanding and appreciation of current limitations and what is appropriate for the Sunshine Coast in order to have a liveable and sustainable future.

DW requests that community concern about dwelling density be addressed.

3.3 Infrastructure Provision

Exacerbating the community’s current concern in relation to some suggested zonings is the lack of a published Local Government Infrastructure Plan (LGIP). DW contends that the proposed new zonings contained in the draft PS are based of pre 2019 infrastructure projects. The Mass Transport Project, once considered for Nicklin Way, has been cancelled or at the very least shelved for the foreseeable future. State budget priority will be given to the Landsborough/Birtinya heavy rail project and the Wave Airport connection over any mass transport system for Nicklin Way. Council therefore needs to now consider how density clusters are best dealt with in relation to the heavy rail/CAMCOS corridor/ Wave route and how these could provide or support accessibility for existing and future residents to public transport arterials. Connectivity to the hinterland and other coastal destinations will be critical.

DW requests that a revised Transport Strategy be developed that aligns with known/announced projects that have secure funding sources.

3.4 Better use of PDAs and SDAs

It is understood that dwelling targets identified for existing PDAs and special development areas (SDAs) have been included in the target projections made by Council. If this is the case discussions between the State and Council should be undertaken to see if additional, but importantly, best practice densification can occur in these areas where infrastructure is or can be easily extended. The current single dwelling concept of siting large dwellings on very small blocks in areas such as Aura has the clear potential to deliver suboptimal outcomes for residents.

If Halls Creek, as some are anticipating falls to development, such development must be eco responsible and embrace a superior liveability index than current developments (best practice adoption- not profit maximisation). Such an index should include affordable and importantly social housing requirements that are delivered throughout any development, not added on at the end as an afterthought.

Council, (notwithstanding the States deferment of Beerwah West), should continue to embrace the planning and delivery options in this area and other possible alternatives to expand available land in the area. Close collaboration over time with the State Government will be essential (please don't let it slip off the radar).

DW encourages Council to have close engagement with the State to improve community outcomes for PDAs and SDAs

3.5 Opportunities for enhanced Master Planning

There are also other areas such as Nambour, that in the past have been sustainable hubs of activity. An area such as Nambour could possibly be an exemplar national model of rejuvenation with support from all levels of Government. A robust and well thought out planning framework for this area with suitable incentives to the development industry (economic development tool) would be a key element to ensuring this rejuvenation occurred. Antidotially, DW hears from authorities that people don't want to live away from the coastal strip. Having an attractive county town with extensive heritage, but with a modern vibe could well service the needs and aspirations of young families, working singles and retirees alike. Please be bold in the vision.

DW encourages the development of an enhanced project to rejuvenate Nambour as a viable and desirable location for both existing residents and business as well as new attractees.

3.6 New Zoning Classification

DW welcomes the introduction of the new zone of “Low to Medium Density” residential.

This allows greater and clearer identification of specific areas for increased density and thus protecting residences in the low density residential development areas. The placing of these, where positioned in the PS (but not necessarily the scope), is supported and aligns with the general concept of “gentle density” adopted by Council.

DW fully supports the concept of “gentle density” and the new zoning classification of “Low to-Medium Density”

3.7 Clarity of Definitions

3.7.1 Bedroom

A Council-endorsed Master Plan document¹ defines ‘bedroom’ as:

Any room which is reasonably capable of being used as a bedroom will be regarded as a bedroom for the purposes of calculating on site car parking requirements (e.g. study, media room)

The same document describes another use for the bedroom definition²:

Note: any room which is reasonably capable of being used as a bedroom will be regarded as a bedroom for the purposes of determining minimum private open space requirements (e.g. study, media room).

Various other documents available on Council’s websites show the bedroom definition is used in determining ‘equivalent dwellings’ for the purpose of:

1. minimum open private space requirements,
2. traffic density impacts,
3. dwelling density, and
4. minimum parking space requirements.

¹ Master Plan N0. 100 (Detailed Planning Area Plan – Detailed Planning Area 13 – Town Centre) 2017, (undated) page37

² Ibid, page 66

‘Equivalent dwellings’ is defined in Schedule 1 of the DNPS. It is accompanied by a note that describes the relationship between the number of bedrooms (as defined) in a dwelling and its dwelling equivalent.

A recent Council Information Sheet³ makes this statement:

It is also proposed to amend the term ‘dwellings’ to ‘equivalent dwellings or ED’s’ as this more acutely captures the many forms of residential development that may establish in the future. This, in turn, provides a more accurate measure for calculating maximum development yield for residential uses.

The definition of ‘Bedroom’ is of primary importance in determining the number of equivalent dwellings in a multi-unit residential development. Therefore, its meaning should not be relegated to ‘Note’ status.

DW asks that Council lists ‘bedroom’ as a definition in Schedule 1 of the DNPS and that ‘equivalent dwelling’ be standardized throughout the Scheme.

3.7.2 Dual key Unit

‘Dual Key Unit is not defined in the DNPS. However, another Council-endorsed Master Plan document⁴ provides this definition:

8.7.4 “Dual-Key Unit” means a dwelling unit that is comprised of two (2) separately keyed areas that are accessed via a common entry foyer. Only one (1) of these areas is to be self-contained (i.e. containing food preparation/cooking facilities, washer, dryer and/or laundry). The non-self-contained area has the appearance and function of a bedroom and is limited to 35m2 in area (excluding balcony areas and common foyer areas) such that it is not able to be fitted with individual food preparation/cooking facilities, washer, dryer and/or laundry.

Dual Key units have appeared in many development applications over the years.

Unless the DNPS forbids the construction of dual key units, DW requests that Dual Key Units be defined in Schedule 1 of the DNPS.

³ Maroochydore Town Centre PDA - Development Scheme Amendment (No. 2) – Information Sheet, (undated), page 1

⁴ Master Plan No. 100 (Detailed Planning Area Plan – Detailed Planning Area 13 – Town Centre) 2017, approved by Sunshine Council on 21/2/2024, page 8.8

.8 Overlays

Having a number of overlays supporting the PS is endorsed but the complexity of their interpretation, priority and capture of issues can become difficult to navigate. Clear notes and commentary are needed to allow individuals and groups to understand these matters as projects are scrutinised. There is also, with some overlays, a hard NO to development if certain criteria can't be met, while with others the process is not quite as clear. (refer turtle overlay and bushfire overlay).

DW requests further clarity in the PS of what is permissible and what is specifically ruled out due the Overlays requirements.

3.9 Transport and Parking Planning Scheme Policy

The Transport and Parking Planning Scheme Policy provides guidance as to when a contribution in lieu of on-site car parking may be considered. DW strongly believes that funds raised by Council via this means should be earmarked for parking projects in the local plan area, as close as possible to the development site in question.

DW asks Council to amend the Transport and Parking Planning Scheme Policy to reflect where the contribution is to be allocated.

3.10 Implementation

Once the PS is approved and in place (possibly late 2026-2027) it will fall to private certifiers and Council to assess any projects against the plan, its codes, other instruments and overlays. A lot of individual and community concern is generated by the interpretation of these instruments and the monitoring of compliance and outcomes. Specifically, care needs to be made in the plan about "guidance vs strict compliance" to codes etc. All too often we see dissatisfaction emerge in the community when undue licence is given to the assessment body.

DW strongly requests in the finalisation of the plan that notes/ editor notes etc clearly state their effect i.e. either guidance only or to be taken as a condition of approval.

3.11 Compliance with approvals

We have heard such things as “well its built now not much we can do”. When there is noncompliance, accidental or otherwise, Council needs to pursue and take action to demonstrate the PS has teeth and will be upheld. Things like conditions on turtle lighting, building site coverage allowances, relaxations due to future landscaping promises (including the maintenance of vertical gardens) and incorrectly labelling structures to avoid non-compliance, need proactive follow up to maintain the community’s confidence in the PS. It should not be up to the community to monitor compliance and call out individual projects when their scope creeps.

DW asks that Council officers are more proactive in monitoring compliance when conditional approval is granted.

3.12 Building levels

To ensure clarity and consistency in the upcoming PS it is recommended that the Council establish clear guidelines and standardises the identification of building levels. Specifically, the PS should define and standardise terminology such as ground level in reference to the natural ground level, lower ground in relation to natural ground level, first level, second level etc. to prevent any misinterpretation or deliberate mis-labelling that could impact compliance with building codes. Implementing these standards will promote transparency and integrity in the development process.

DW requests standardisation in identifying building levels for transparency to the community.

3.13 Open Space

It is essential that the PS gives clear instruction as to what is acceptable building site coverage, what constitutes actual buildings and what should be maintained as open space within each site. For immediate neighbours, open space offers several key benefits including maintaining enhanced privacy and improving air quality. Additionally, such open spaces provide valuable visual relief, reducing the sense of confinement and creating more pleasant and inviting environments. They help to minimise building bulk and overshadowing thereby enhancing liveability and comfort for residents. Furthermore, maintaining open spaces demonstrates a commitment to environmentally friendly living by supporting biodiversity, managing stormwater and promoting sustainable urban development. Collectively these benefits contribute to healthier more liveable and environmentally conscious neighbourhoods which are visually appealing.

3.14 Importance of privacy and amenity in building design

Privacy and amenity are fundamental aspects of creating comfortable liveable neighbourhoods that respect residents' personal space and promote wellbeing. Privacy ensures individuals feel secure and unobstructed in their homes while amenity encompasses the overall quality of living environment including natural light, outdoor space and visual comfort. DW believes private certifiers had been given at times opportunities to offer solutions that strongly favour the contracted designs without considering the privacy and amenity of neighbouring properties. It is important to remove any ambiguity around how privacy and amenity is interpreted, and Council should include guidelines which provide clear methods of protecting neighbourhood privacy in amenity including a greater emphasis on preventing overlooking, a guide for structure of privacy screens and other important considerations.

DW, in relation to 3.13 and 3.14, strongly supports best practice in urban design and endorses the Sunshine Coast Design Planning Scheme Policy approach and it being a fundamental element of the PS.

4.0 Comments on Local Plans (LPs)- “North Shore” and “Coolum-Peregian”.

4.1 Context, Setting and Vision for the North Shore and the Coolum-Peregian LPs

It is pleasing to see within these two LPs that there is recognition these areas have limitations for further development due to their physical topography, natural hazards and environmental constraints including prevalence to flooding, steep and unstable land and native vegetation.

Importantly, these areas have significant cultural meaning across mountains, waterways, beaches and headlands. These are important to the whole of the Sunshine Coast community.

These characteristics, identified in the LPs clearly limit development “opportunities”. Furthermore, the importance of views and vistas are recognised in the plan especially when considering vista of the likes of Mt Coolum, Ninderry, Mudjimba Island and the magnificent lookout vantage points e.g. Point Arkwright, Point Perry and Coolum Hill.

DW congratulates Council for this identification.

4.2 Gentle Density

As mentioned above, DW supports the introduction of a new zone “Low to Medium Density” and its relationship with other residential zonings. This allows on balance, for increased density where appropriate while respecting existing landowners and residents in terms of development potential/impact in their neighbourhoods.

DW supports the siting of the residential zonings as contained in the above-mentioned LPs.

4.3 General Comments on plans

4.3.1 Golf Courses.

DW fully supports golf courses being listed with a zoning of “Sport and Recreation” classification. In particular, the Coolum Resort’s golf course moving from “Emerging Communities” to “Sport and Recreation” is particularly welcomed and reinforces not only the Resort’s master plan but also the community expectations that the golf course is a sporting facility now and into the future.

4.3.2 Yaroomba Beachside.

At PO23 of the performance outcomes table (LP Coolum-Peregian), Yaroomba Beachside is referenced as a precinct with its primary function as an “integrated resort facility”. DW believes that this classification is outdated and fails to recognise the current owner’s commitment to develop the site as a residential community. It is fully appreciated that the site is covered by its separate Masterplan and that this plan takes precedence. However, the zoning of the site on the maps associated with the ePlan, show the site as emerging communities (albeit a wide definition of use).

DW requests Council to rephrase PO23 (a) and (b) to an intent for the development to be one primarily of a low-rise residential development.

4.3.3 Limited Development Site (Object Id. 2742).

There is a parcel of land on the southside of David Low Way, Marcoola opposite Boundary Crescent (that is understood to be owned by the developer Mal Pratt). This

site is currently zoned and is proposed to retain the zoning of “Limited Development” under the PS. There has been substantial fill placed on this site overtime and DW would be very concerned if this parcel was developed in anyway that negatively impacted residential neighbourhoods to the south or adversely affected future traffic movement in an already congested area. If any development is envisaged for the site, it should be of a nature that does not impact on the existing hierarchy of business centres (nor be ‘out of centre’) or be in conflict with existing surrounding uses.

DW supports the parcel having a “limited development” classification.

4.3.4 Support for Sport and Recreation.

DW strongly supports additional areas being included in the “Sport and Recreation” zone to add amenity, social engagement and wellness outcomes for the community. One such site (object Id. 6261) is located to the south of the airport on David Low Way and adjacent to existing sporting and community facilities. This particular parcel is of significant future value to community and one that we welcome future engagement with as and when concept plans are progressed.

DW fully supports the site being a sport and recreation asset for the community

4.3.5 Turtle Nesting and Light Glow

Coolum Coast Care has raised a number of issues with DW in terms of protecting turtle nesting sites and limiting development that causes light glow. Coast Care is expected to make its own submission however, DW wishes to reinforce the need to ensure turtle sensitivity mapping is up to date and every endeavour is made to protect these endangered species. Of particular concern is light glow and spillage as the emerging trend of coastal housing, wishing to access sea views, only adds to light glow onto what has previously been dark beaches.

The increase in heights for buildings in areas such as Cotton Tree and Mooloolaba, which are not currently covered by sensitivity mapping, have the clear potential to cause disturbance. In addition, the community has seen developer efforts to either forgo scrutiny or sidestep conditions with variance applications after approval by Council.

DW recommends that Council consider:-

- (a) how densification of buildings, both in scale and height, is impacting on the protection of these endangered species, and**

(b) how best to increase the scope and coverage of the current sensitivity mapping.

Such mapping could be tied to HAT (Highest Astronomical Tide) measurements and be broadened further westwards (e.g. extended to David Low Way and Mudjimba Esplanade).

4.4 Aligning PS and LP with infrastructure provision

The Northshore and Coolum-Peregian areas generally are already poorly serviced by infrastructure, particularly road infrastructure. There are several road and transport proposals at various stages of assessment. These include early identification of need, business case development, substantiated detailed planning or awaiting clarification of Council/State/Commonwealth funding sources.

Complicating this is the fact that some business cases have been deferred or now require significant updating re. costing and option identification. Indeed, some business cases or early assessments are based on, at best, questionable assumptions regarding current and future traffic volume carriage capabilities of the existing road system.

DW is of the opinion that transport and ease of movement for both public and private travellers will be a significant source of frustration for residents and tourists across the coast and hinterland areas in the future. This is especially so if projected population densities are realised whether they be people resident in the area or passing through the area to other destinations.

The main road networks that will service the region are State controlled and the onus is on the State to ensure that this system not only suitably services the community and visitor needs now, but services them during the life of the planning horizon. All too often developments are progressed on the basis that infrastructure will catch up when the need arises. Already the road system, at peak times is at capacity and with even minor disruption such as breakdowns and accidents can cause traffic chaos as seen on the Bruce Highway, Sunshine Coast Motorway and the likes of David Low Way. DW contends that major urban development would further exacerbate traffic congestion on these main motorways.

The Sunshine Coast Motorway duplication from Mudjimba to Coolum is essential together with on and off /ramps near Suncoast Beach Drive/South Coolum Road. The widening of David Low Way north of the Airport to at least Petrie Street Marcoola and south through the Marcoola Village (Surf Air precinct) to Airport Drive needs active

consideration and firm commitment. We expect Council to push these causes further and highlight these needs when submitting the Planning Scheme for State approval.

The lack of a LGIP at this stage makes it difficult for the community to understand the timings for infrastructure provision and the scale of projects. We look forward to the LGIP's eminent release.

DW requests the publication of the LGIP before submission of the PS to the State

4.5 Coastal Bike Path-Map 5.5A Coolum Elements

It is noted that the coastal bike path on Map 5.5A-Coolum Elements is proposed to be built along the dunal system from Tanah St East to the southern boundary of the parabolic dune, along David Low Way to Warragah Parade and then crossing through Birrahl Park and along the sand dunes to Point Arkwright. The community fully supports active transport and the benefits of connecting this area with other path systems however the location in an environmentally sensitive area is not supported. DW requests that Council carefully consider options including infrastructure to be provided by Yaroomba Beachside development to exclude any intrusion of a proposed path onto the dunal system from Tanah Street East to Point Arkwright.

DW strongly objects to building a coastal bike way that in any way interferes with the coastal dunal system.

Specifically, the Coolum Elements map appears to be deficient in many respects:

1. The "Through Block Pedestrian/Cycle Linkage" does not appear to be compatible with existing approved developments.
2. The proposed coastal pathway (dotted yellow) from eastern end of Tanah Street East to David Low Way near Yaroomba Meeting Place should be removed. Construction would destroy significant coastal vegetation.
3. DW seeks clarity if the "Indicative Local Recreation Park" icon shown on Yaroomba Beachside property is valid and has been negotiated with the developer (Dennis Corp).
4. Vegetation Buffers
 - a. Are the vegetation buffers shown on the map protected in any way?

- b. The 'Vegetation Buffer' designation should be extended to other buffers that include:
 - i. the buffer that is on the northern side of Tanah Street East,
 - ii. the buffer that runs along David Low Way from Tanah Street West that follows the creek to Suncoast Beach Drive
 - iii. the buffer that runs along the eastern side of David Low Way, from near Tanah Street East then adjacent to the Boardwalk Estate, which extends beyond the Coolum Local Plan area.

5. The Coolum Local plan Area Map is truncated at the southern end.

DW seeks clarity on issues in 3.5 and asks that Council also includes the entire local plan area in map 5.5A.

5.0 Conclusion

DW thanks Council for the opportunity to provide comment on the latest draft PS and looks forward to the consideration and inclusions of our comments. We would like to acknowledge the input of our members and value of associate organisations in allowing DW to provide a balanced and informed submission.

Should Council officers require further clarification on the issues raised above please do not hesitate to contact DW through its President Mr Brian Anker at President@developmentwatch.org.au or by phone 0419707924.

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