

19<sup>th</sup> September 2025

Sunshine Coast Regional Council  
Proposed Sunshine Coast Planning Scheme  
Reply Paid 84374  
Sunshine Coast Mail Centre Qld 4560

c/- [newplanningscheme@sunshinecoast.qld.gov.au](mailto:newplanningscheme@sunshinecoast.qld.gov.au)

Re: Combined submission to Sunshine Coast Council by Sunshine Coast Business Council, Property Council of Australia (PCA) Queensland Division and Urban Development Institute of Australia (UDIA), regarding the Sunshine Coast Council's Draft Planning Scheme 2025.

## INTRODUCTION

The Sunshine Coast Business Council (SCBC) represents the interests of industry and the business sector in the Sunshine Coast region. This submission is made in response to the Sunshine Coast Council (SCC) public consultation period for the Sunshine Coast Draft Planning Scheme.

It has been prepared as a collaboration between Sunshine Coast Business Council (SCBC), Property Council of Australia Queensland Division (PCA) and the Urban Development Institute of Australia Qld (UDIA). It reflects the discussions and recommendations made separately to the submissions made by both PCA and UDIA, which SCBC also supports.

The submission reflects the discussion and outcomes of the SCBC 2025 Think Tank (TT) Series 9 which was attended by twenty-eight (28) business, industry and local government leaders over 2 days, including Mr John Baker, CEO Sunshine Coast Council (SCC), Ms Debra Robinson, Director Sustainable Growth and Planning SCC, Mr Steve Patey, Manager Strategic Planning SCC and Mr Chris Le Serve, Chief Economic Development Officer SCC. (See Appendix 1). The topic for the TT series was – Preparing an industry submission to SCC Draft Planning Scheme – which was conducted for the purpose of reviewing, analysing and debating the draft planning scheme, undertaken by a team of planning and industry professionals comprising PCA, UDIA and SCC planning experts.

The purpose of the TT series was to engage in open and without-prejudice discourse between Local and State Government representatives and private industry, to agree on the growth challenges facing the region and to discuss the regulatory framework required to achieve targeted outcomes. A key goal of the TT series was to find common ground regarding the fundamental elements which form a modern planning scheme and a fit for purpose guide for future growth and development while protecting the natural resources, diversity and richness of the Sunshine Coast.

SCBC's objective was to reflect the feedback and recommendations of its membership and to inform the SCC's understanding of industry's requirement of an effective and efficient planning scheme and planning operating environment. The discussions and output from the 2025 TT Series 9 are consistent with those of the 2021 SCBC TT Series 5 and that reflected in our 2022 submission during the preliminary consultation of the proposed SCC New Planning Scheme Project.

We believe the future Planning Scheme has the critical role of facilitating orderly and predictable growth management to ensure more affordable and sustainable housing; while ensuring business can prosper and residents can access secure, productive and high-value work as part of a vibrant local economy.

This is particularly important over the next decade, the life of the new planning scheme, as it leads into the Brisbane 2032 Olympic and Paralympic Games (The Games) preparation. The opportunities and challenges afforded by The Games are additional to the pressure of addressing population growth, housing and infrastructure development. In our view, this must be considered and reflected in the new planning scheme.

## BACKGROUND

We recognise that over much of the life of the existing planning scheme, SCC have expressed its preference for infill and more compact development to manage population growth. Over this time SCBC, together with PCA and UDIA, have supported infill development but have consistently challenged infill targets largely because of the effort and time required to assemble fragmented land, feasibility constraints and community opposition. We believe this assumption alone calls into question the ability to meet infill targets in a timely way as has been, and is still, the experience across the Sunshine Coast during the term of the current planning scheme and the SEQ Regional Plan (SEQRP).

We have previously, and continue to argue, that expansion (greenfield) development is critical to ensuring adequate land supply for the region. It has driven most supply in recent years, has the capacity to do so in the future. The greenfield locations have provided the most affordable housing product, which provides options for people on moderate incomes, including our critical workers.

Shaping.SEQ.8689 projects a population target for the Sunshine Coast of 565,700 by 2046, an increase of 195,000 on the current population of 376,000. This projected population growth requires 84,800 dwellings to be delivered in that period, or an estimated 3,727 new dwellings per year. In the 2023-2024 FY, Sunshine Coast constructed only 1,600 detached dwellings and 1,360 units and has already accumulated a 3,000-dwelling shortfall over the past 3 years.

SEQRP promotes increased gentle density across SEQ in consolidation and expansion areas and sets a minimum 70/30% consolidation/expansion dwelling growth ratio across the region. It anticipates an increase in single-person households to 2046 and a higher ratio of small household-to-small dwellings, with an ageing population contributing to the increased demand for smaller households.

To meet the SEQRP consolidation/expansion growth ratio requires 57,400 (consolidation) new dwellings on the Sunshine Coast, or 2,609 infill dwellings per year. (It should be noted that only 1,360 infill dwellings were delivered in the 2023-2024 financial year). This will be facilitated by the achievement of attached medium-rise development in walkable catchments along high-frequency public transport networks and by the establishment of a Bus Rapid Transit network as proposed in the Sunshine Coast Public Transport Project, which remains unfunded or committed.

We continue to firmly believe that housing supply must also be facilitated by greenfield development. We acknowledge that Council has retained Beerwah East as a future option, consistent with ShapingSEQ, however there are many unresolved planning and tenure challenges requiring resolution that will delay the availability of this location for major development in the medium term (10-20 years). We maintain the position that the Sunshine Coast will need more greenfield land supply.

On this basis, we are greatly concerned that SCC has not recognised the role of the Potential Future Growth Area (PFGA) at Halls Creek, including Aura South, and Yandina North as a major future urban growth front. We believe these omissions are not based on informed planning decisions.

As we advocated in 2021, housing supply monitoring indicates there is a looming shortage of land supply and SCC have the responsibility to include all land included within the Urban Footprint of ShapingSEQ, such as the Halls Creek PFGA, within the draft planning scheme to ensure land is available when needed. We believe it is remiss not to do so and we urge the Council to reconsider its previous decisions in this regard.

## KEY ISSUES AND RECOMMENDATIONS

### 1. The Strategic Framework

It is recognised that the draft new Scheme's Strategic Framework details the Council's intent to deliver a "compact settlement pattern" contained wholly within the Council's current growth management boundaries and prioritises the retention of the SC region's landscape areas, to be preserved for rural activity and environmental conservation.

This framework essentially limits development for urban purposes to being contained within the currently recognised urban footprint and the Council's growth management area.

In particular, SCBC questions the Strategic Framework's Theme 1 (Shaping Sustainable Growth) statement; that this new draft planning scheme should consider Caloundra South and Palmview developments to be "substantial new and emerging communities" that are still capable of "accommodating the vast majority of the Sunshine Coast's residential expansion opportunities". Both growth fronts have rapidly developed, reflective of market demand, far quicker than anticipated and will likely be completed within the lifespan of this new draft planning scheme.

While the draft planning scheme acknowledges Beerwah East as a future option for new greenfield development consistent with Shaping.SEQ.8689, the Sunshine Coast requires expansion areas that can be brought to the market relatively quickly. As stated above, Beerwah East currently has many unresolved planning and tenure challenges, which will significantly delay the availability of this location for major development.

The Council's current Strategic Framework makes no reference to the possible new urban expansion areas within the Halls Creek Potential Future Growth Area (PFGA) and Yandina SEQ Development Area, further to their identification within the Shaping SEQ 2023 regional plan.

In this context, the Strategic Framework's settlement pattern identified on Map SF1 Shaping Sustainable Growth - Settlement Pattern Elements, is opposed by the SCBC insofar as it does not align with the Queensland Government's Shaping.SEQ.8689 regional plan (SEQRP).

### Recommendation 1

It is advocated by SCBC that the draft Sunshine Coast Planning Scheme must reflect a more balanced urban and economic growth model, where additional urban expansion areas such as the SEQRP-identified Halls Creek Potential Future Growth Area (PFGA) and Yandina SEQ Development Area, are nominated for expansion beyond the Council's currently nominated Local Growth Management Area boundaries.

To ensure an appropriate scale of sustainable urban growth delivery for the Sunshine Coast into the future, the new planning scheme must be better aligned to Shaping.SEQ.8689 Northern sub-regional Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping.SEQ.8689.

While the Yandina SEQ Development Area is only in its relative infancy, with respect to detailed land use investigations and defining a statutory framework process, the land holding situated within the SEQRP-identified Halls Creek PFGA is uniquely positioned to leverage existing and planned, local and regional infrastructure, to support significant urban growth in this location. The landowner is well advanced in the EPBC approval process and has undertaken significant technical investigations and community consultation to inform development plans for the site.

Therefore, we recommend the draft Sunshine Coast planning scheme is immediately amended to acknowledge the Halls Creek PFGA as being critical to ensuring dwelling supply can be delivered at the pace and scale needed to address the region's ongoing housing challenges, both in terms of affordability and supply, into the future.

## 2. Defining the Regional Inter-Urban Break

Further to Key Issue 1 above as it relates to the new draft planning scheme's Strategic Framework, it is also evident that the draft scheme defines its intended regional inter-urban break differently to Shaping SEQ 2023, which is evident within Theme 1 of the Strategic Framework. The settlement pattern is clearly identified on the associated planning scheme Map SF1 Shaping Sustainable Growth - Settlement Pattern Elements and Element 6 – Green Frame, the proposed intended land uses within the Glasshouse-Pumicestone Local Area Plan, the Scenic Amenity Overlay Code and associated draft scheme Schedule 2 mapping.

It is our view that the new planning scheme must be aligned to Shaping SEQ 2023 Northern sub-region Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping SEQ 2023, to adequately protect the region's high quality natural environment and waterways, while balancing that outcome with appropriate scale of sustainable urban growth delivery options for the Sunshine Coast, into the future.

This current misalignment of the draft planning scheme with Shaping SEQ 2023 significantly compromises Shaping SEQ 2023 Chapter 4, which identifies the Halls Creek PFGA.

The role of any PFGA within Shaping SEQ 2023 is to provide the Queensland Government and Councils with strategic land supply options and flexibility to manage longer-term population growth.

The proposed scheme fails to align with the Northern Inter-Urban Break (NIUB) boundaries as defined by ShapingSEQ 2023. Instead, it includes the Halls Creek PFGA land—which is largely cleared with minimal environmental value—within SCC's own defined inter-urban break. This has obvious ramifications to future land supply options.

## Recommendation 2

As with Recommendation 1, to ensure an appropriate scale of potential, sustainable urban growth delivery for the Sunshine Coast into the future, the new planning scheme must be better aligned to Shaping SEQ.8689 Northern sub-regional Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping SEQ.8689.

Additionally, it must be amended to align its regional inter-urban break as represented on the current draft planning scheme Map SF1 Shaping Sustainable Growth - Settlement Pattern Elements, with the NIUB identified within Shaping SEQ.8689.

### 3. Land Zoning

It is acknowledged by the SCBC that the draft Scheme proposes to introduce five new zones for the Sunshine Coast, as well as substantial changes to current land use zones. The five new zones are recognised as being: a Mixed Use Zone, Industry Zone, Innovation Zone, Low-Medium Density Residential Zone and a Neighbourhood Centre Zone.

#### 3.1 Residential Land Zoning

SCBC recognises and endorses in principle, the draft Scheme's intention to create opportunities for a larger range of housing types, including smaller homes to match identified housing needs, and introduce certain provisions to encourage affordable and diverse housing in established urban areas.

In specific locations, particularly along the Nicklin Way transport corridor between Currimundi and Minyama and in areas of Alexandra Headland and Maroochydore, the new scheme proposes an uplift in housing density and building height, with a stated aim to increase land supply for a broader range of housing, with affordability and diversity in mind. It is understood that this approach is to enable consolidated urban growth in locations close to centres of activity for jobs and leisure, which are readily serviced by, and dependent on, existing or planned, high-frequency public transport.

While SCBC generally supports this consolidation approach to improve housing choice, land use efficiencies and public transport corridor planning, we believe to succeed, the current draft planning scheme's identified settlement pattern (as directed by its zoning provisions) will require an abrupt reversal of the current housing market trend, combined with community support.

An infill and density strategy needs to be realistic. The assembly of fragmented land for redevelopment is problematic, can be unsettling for the immediate community, and unlikely to efficiently deliver the volume of dwellings in the time frame anticipated by the SCC, on the Sunshine Coast. Consolidation supply has consistently been below targets and reliance on this increasing is unjustifiable in the short term.

It is considered unlikely that the local property market will significantly change, even moderately quickly, in direct response to the new planning scheme's encouragement of medium density residential development in the rezoned residential areas. This is due mainly to the anticipated high-costs and associated issues with retrofitting higher-density residential development in well-established, low-density residential areas, with existing high levels of market appeal/demand, due to high standards of amenity and liveability.

This medium density residential development cost feasibility issue, identified as being particularly relevant to high-demand beach-side suburbs along the coastal corridor between Currimundi and Buddina (in particular), is expected to substantially hinder in the short to medium term, the intended outcomes of Council's vision for urban renewal and consolidation on the Sunshine Coast.

Conversely, if Council's vision for urban renewal and consolidation along the coastal corridor does progress relatively quickly under the provisions of the new draft planning scheme, then Council should consider how the current inadequacies of public transport along the coastal corridor will directly conflict with the new draft scheme's retention of demand-based parking rates for residential development. Such demand-based parking rates will result in new medium density and mixed-use residential development being required to accommodate substantial car parking on site. This will increase development costs, particularly in geographically tight locations between Nicklin Way and the beach, in areas of the Coastal Corridor such as Warana and Buddina.

Sunshine Coast's current integrated transport network will require significant upgrades, changes and improvements (if not a total overhaul) to meet the changing needs of the growing community and facilitate the "more compact and efficient settlement pattern" set out by the planning scheme.

#### Recommendation 3.1

Future growth being accommodated within the coastal corridor requires a significant upgrade to the Sunshine Coast's current integrated transport network in conjunction with a new Dedicated Rapid Transit Corridor. It also requires review of demand-based parking rates for residential development.

The new draft planning scheme needs to provide additional, infill area options to overcome viability and fragmentation challenges for new housing projects. More density is desirable within the Major Activity Centres of Caloundra and Maroochydore, along the new Direct Sunshine Coast Rail Line connection, and/or the accelerated delivery of Beerwah East, together with the timely delivery of development within the SEQRP-identified Potential Future Growth Area at Halls Creek and at lower scale more broadly.

### 3.2 Specialised Centre Zoning and Mixed Use Zoning

SCBC recognises that the proposed planning scheme, with the introduction of a new Mixed Use Zone, provides for specific locations to offer a range of new infill housing options. It is understood that this zone will bring homes and business together to encourage vibrant daytime and night-time economies, close to transport and major centres.

It is also understood that this Mixed Use Zone, on the outskirts of centres and along major roads and transit corridors, will accommodate buildings up to 6 or 8 storeys, predominantly comprising multi-unit residential activities for permanent living, above a limited range of business activities and other non-residential activities.

Most notably, a large tract of (currently Industrial) land in Warana, west of Nicklin Way and between Technology Drive and Main Drive, has been proposed to be zoned as mixed use. Furthermore, significant land area at Minyama, that is currently zoned as Specialised Centre Zoning and historically used for large format retail uses, is now proposed for mixed use zoning.

It is recognised that the Specialised Centre Zone, under the new draft planning scheme, is to provide for large floor plate retail business activities and other activities which, because of their size, requirement for high levels of accessibility to private motor vehicle traffic, or other characteristics, are best located outside of activity centres, adjacent to major roads.

Furthermore, it is understood that development in the Specialised Centre Zone is to provide for a range of retail business activities, predominantly in the form of showrooms, garden centres, hardware and trade supplies and outdoor sales, that have large floor plates and require high levels of visibility and accessibility to major roads.

The Large Format Retail Association (LFRA) as a key member of the SCBC, has provided detailed feedback to SCBC on the anticipated impacts of the new draft planning scheme upon this industry,

on the Sunshine Coast. The LRFA has identified a need for a further 28 hectares of Large Format Retail land in the Sunshine Coast Local Government Area to 2041, in addition to the already zoned, Specialised Centre Zoned land.

The draft Planning Scheme's current zoning provisions have been identified by the LRFA as having the following impacts on the industry:

- The draft Planning Scheme proposes to rezone the majority of the existing Specialised Centre Zoned land to a Residential zone - the Mixed Use zone and does not plan to re-distribute the lost zoning of Specialised Centre Zone land. Thereby, effectively reducing the amount of appropriately zoned land for the establishment and expansion of Large Format Retail uses, leading to a net loss of Large Format Retail appropriate land in the Sunshine Coast. This is despite the need for more land as outlined by the LRFA in their submission to SCC.
- The planning and design controls intended to regulate Large Format Retail uses, particularly in the Mixed Use Zone, are not conducive to the commercial and practical realities of Large Format Retailing. This needs to be reconsidered. In particular, the Mixed-Use Zone requires Large Format Retail uses be co-located with medium to high-density residential land uses, which is inconsistent with the Zone intent.
- The draft Planning Scheme as currently drafted, will significantly constrain the continued operation and growth of the Large Format Retail sector within the Sunshine Coast Local Government Area.
- The Draft Planning Scheme needs to be changed to provide for more Specialised Centre Zoned land, particularly where it seeks to transition existing Specialised Centre Zoned land to a Mixed Use Zone. The current thinking, to include large format retail uses in the Mixed Use Zone, as part of residential development, needs to be reconsidered.

A number of existing Specialised Centre Zoned areas are proposed to be rezoned to the new Mixed Use Zone, under the provisions of the new draft planning scheme. The Mixed Use Zone introduces residential uses to the land and encourages a mix of commercial/retail and residential activities in a single building. As a result, the majority of existing Large Format Retail zoned land (Specialised Centre Zone) has been rezoned to a residential zone, which is not conducive to the development and efficient operation of Large Format Retail uses.

#### Recommendation 3.2

It is recommended that consideration be given to amending the new draft planning scheme to address the future scarcity of Specialised Centre Zone land, by applying the zone to new areas where consolidated LFR development can be readily accommodated.

Potential locations could include:

- In the southern part of the Sunshine Coast region, preferably close to the Bruce Highway and near future urban development precincts at Nirimba/Bells Creek and the Beerwah-Landsborough corridor.
- At a central location where development can cater for the demands of people living close to potential sites near Sippy Downs/Palmview (close to the Sunshine Motorway/Bruce Highway intersection) or further north near the Maroochy Road/Bruce Highway intersection.
- North of the Maroochy River to serve people living in the Northern reaches of the Sunshine Coast and surrounds, with a location close to Sunshine Coast Airport being an attractive opportunity.

### 3.3 Industrial Land Zoning

It is understood that a new industry zone is proposed and will be a combination of the current medium and high impact industry zones, for the stated purpose of “simplicity and flexibility”.

The proposed planning scheme further states that it “provides room for industry to grow” while recognising that the Sunshine Coast currently has a limited supply of industrial land. The proposed planning scheme indicates that it includes measures to ensure existing and new industrial land is preserved for industrial activities, although the evidence of this within the Scheme mapping is not immediately apparent.

The draft Scheme states that it intends to “replenish a diminishing supply of industrial land” by allocating additional land within new Industry Zones at Beerwah, Corbould Park and Yandina. It aims to increase the supply of zoned industrial land across the Sunshine Coast region by approximately 160ha or 18% to support continued economic growth.

However, as noted, this net quantum of new industrial land is not recognisable within the current Scheme mapping given the loss of existing industrial land to proposed new zonings, such as the Mixed Use zoned land at Warana and the new Specialised Centre Zone adjacent to Wises Rd and Kayleigh Drive, Maroochydore.

We are also aware that the Corbould Park site (235 Racecourse Rd), while comprising ~200ha, is significantly constrained by the mapped environmental, flooding, wetland and waterway issues so prevalent over most of this site area, as prescribed by the draft planning scheme and Queensland State mapping.

Industrial planning provisions have also not been modernized, reflecting an outdated view of industrial activity, with no clear acknowledgement on evolving industry needs or emerging economic drivers. For example, building height is generally capped between 8.5 to 15m. Such height restrictions are inconsistent with contemporary industry (and construction) requirements.

While Council seeks to attract advanced sectors such as food manufacturing, data centres and aerospace, the proposed planning scheme does not enable or incentivize the very forms of development these industry types require. There is a fundamental mismatch between Council’s stated economic aspirations and the restrictive planning framework proposed.

#### Recommendation 3.3

It is considered that the draft Planning Scheme must nominate significant, additional, well-located land for industrial and employment purposes to address the above-identified land use constraints over the significant sites currently identified within the draft planning scheme, and the accelerated uptake of available industrial and commercial land in recent years.

It is noted that employment localities are allowed for at Beerwah East. We recommend that the obvious potential for industrial and commercial land designation within the Halls Creek PFGA and the Yandina SEQ Development Area, must also be explored as part of this draft planning scheme process. This is supported given the extent of unconstrained land within these sites and their strategic locations proximal to existing major road and rail routes.

### 3.4 Rural Land Zoning and the New Agricultural Land Overlay

It is recognised that the draft Scheme, through the Agricultural Land Overlay, intends for rural and agricultural productivity to play an important role in the Sunshine Coast’s economy and will subsequently support these activities with new protections for agricultural land. We understand this productivity will be supported by the continued allowance of compatible activities like agritourism and agribusiness in rural areas but will prohibit urban land uses.

In this context, it is also acknowledged that the rural areas of the Sunshine Coast contribute significantly to our economy, landscape character and sense of place.

We are aware that the State Planning Policy (SPP) provides a consolidated and comprehensive view of the state's interests in land use planning and development and sets out the matters that must be addressed in local government planning schemes and regional plans. In this regard, we realise that the Queensland Government's Department of Infrastructure, Local Government and Planning (DILGP) require local government to integrate the State's Interest for agriculture into the new planning scheme.

However, we also note that the draft planning scheme's Agricultural Land Overlay mapping currently intrudes upon areas of land identified within Shaping SEQ 2023, that are being either included within the urban footprint or nominated for possible, future urban expansion.

We understand it is not the intention of the SPP to compromise the stated outcomes of Shaping SEQ 2023. That the SPP and all regional plans perform complementary roles and regional plans provide the basis for prioritising, qualifying or resolving the SPP state interests in a particular region as necessary. In this regard, the regional plan provides the specific strategic direction and policies to manage identified competing state interests for the region.

On this basis, to ensure both optimal rural and agricultural productivity and appropriate scale of sustainable urban growth delivery for the Sunshine Coast into the future, Sunshine Coast Council's current draft Agricultural Land Overlay needs to be aligned to Shaping SEQ 2023 Northern sub-regional Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping SEQ 2023.

#### Recommendation 3.4

The agricultural land overlay mapping should be revised to ensure that it does not conflict with, nor compromise, Shaping SEQ 2023 Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping SEQ 2023.

In particular, and further to land that is otherwise included within Shaping SEQ 2023 defined urban footprint, neither the Halls Creek PFGA nor the Yandina SEQ Development Area should be subject to the draft planning scheme's Agricultural Land Overlay.

This recommendation is made on the basis that the draft planning scheme's Rural Land Zoning and relevant Local Plan area provisions will adequately ensure short to medium term rural productivity will continue in these possible urban transition areas, while being supported by the continued allowance of compatible activities like agritourism, and without premature impacts on rural productivity, the landscape character and the scenic amenity that underpins our region's natural competitive advantage.

#### 4. Telecommunications Facility and Utility Planning Scheme Code and Policy

It is recognised that the draft planning scheme proposes a relevant policy within its Volume 3, Part 4, to the purpose of:

- a) providing general advice about the context and rationale for certain assessment benchmarks for assessable development (assessment benchmarks) contained in the Telecommunications Facility and Utility Code;
- b) providing advice about assessment benchmarks in the Telecommunications Facility and Utility Code; and

- c) identifying and providing guidance about information that may be required to support a development application which is subject to the Telecommunications Facility and Utility Code.

The currently proposed planning controls detailed in the draft Telecommunications Facility and Utility Code, together with the directions contained in the draft Telecommunications Facility and Utility Planning Scheme Policy, nominate Sunshine Coast Council's acceptable solutions that encourage co-location of telecommunication infrastructure upon other built structures including (but not limited to) water towers, sportsground spotlights, high rise buildings, electricity poles, and shopping centres, or located within industrial/commercial zones.

Such Code requirements relate to Sunshine Coast Council's prioritising of location and site suitability, visual amenity and landscape character, when assessing a proposed development for a telecommunications facility.

This direction substantially constrains the capability of telecommunications service providers to deliver the timely provision of essential telecommunications infrastructure and subsequent access to communications services.

#### Recommendation 4

The draft Telecommunications Facility and Utility Code, together with the directions contained in the draft Telecommunications Facility and Utility Planning Scheme Policy, need to be significantly amended, such as to:

- Recognise mobile telecommunications infrastructure as having the same critical importance as other essential utilities (water, electricity, fixed line communications, etc)
- Ensure adequate mobile coverage and network capacity across the entire Sunshine Coast can be delivered in a timely, efficient manner, by way of relevant Code provisions striking a reasonable balance between visual impact issues and the timely provision of the essential service.
- Further to the point above, significantly reduce the prescriptiveness of the Acceptable Solutions currently listed within the draft planning scheme's Telecommunications Facility and Utility Code.
- Develop a telecommunications master plan capable of identifying future needs and preferred locations for new telecommunications infrastructure, in line with continuing and newly emerging residential and commercial development areas.

#### 5. Supporting economic growth through the planning scheme

Over the next 10 years, the economy of the Sunshine Coast is expected to grow from \$22B in 2022 to \$33B in 2033. Rapid population growth will be a key driver of the projected economic growth, requiring significant investment and funding in economic and social infrastructure.

The housing shortfall and ongoing development of affordable and diverse housing stock is probably the most critical development issue to be resolved to enable other development to proceed.

Without available housing the Sunshine Coast will not be able to attract the workers and talent required to deliver and operate the range of infrastructure required over time.

Approximately \$10B of infrastructure is being developed (and funded) in the lead up to the Brisbane 2032 Olympic and Paralympic Games including:

- The Wave - integrated public transport solution featuring heavy passenger rail and metro-style services. (Public funded).

- Upgrades to the Sunshine Coast Stadium in Kawana Sports Precinct. (Public funded).
- Upgrades to the Sunshine Coast Mountain Bike Centre. (Public funded).
- Sunshine Coast arena and a new Athlete Village. (Blend of Private and Public sector investment).

While the delivery of the above projects may have little reliance on the future planning scheme, the role of governments is key for facilitating investment, particularly local government based on the top factors that investors have indicated through three separate SCBC.Investor.Market.Surveys conducted between 2013 and 2022. The key factors that influence investor decisions were:

- Ease of getting approvals
- Meeting mandated/regulatory timeframes
- Policies and incentives that improve the project's viability.

The key findings, consistent across the surveys, indicated the Sunshine Coast region offers strong fundamentals for investment when considering how closely they align to the investment criteria identified by organisations. These factors included:

- Strong population growth.
- The demographic and market profiles.
- The strength of demand.
- Achieving target rates of financial return.
- Access to labour and the ability to attract workers.
- Positive engagement between investors, council employees and councillors.

Private sector investment is critical to growing the economy in the future. Investors have a choice when deciding on the optimal locations in which to take a risk and invest with competition for investment strong within the SEQ regions.

The new planning scheme must therefore be premised on clear, transparent and consistent direction, assumptions and processes and written and structured to:

- Give confidence and certainty to investors and developers to invest in the Sunshine Coast.
- Facilitate private sector investment and improve investor sentiment toward the region.
- Better align to Shaping SEQ 2023 (Northern sub-regional Chapter 3, Part A: Outcomes and strategies, Part C: Northern sub-regional directions, and Chapter 4, Delivery of Shaping SEQ 2023) to ensure targeted urban growth targets are met now and into the future.
- Empower the key principles of the Council's Regional Economic Development Strategies (REDS) within the Planning Scheme Codes, not just as themes within the Scheme's Strategic Framework.
- Enable and encourage future economic growth across key industries, including those not previously included in the REDS.
- Deliver the Games 2032 projects.
- Generate sustainable and high-value employment opportunities in the broader region.
- Facilitate significant improvement in housing supply and diversity of housing opportunities, so critical to providing dwellings for families and workers.

## 6. Conclusion

SCBC, PCA Queensland Division and UDIA has appreciated the opportunity to work with Sunshine Coast Council and industry to review the Draft Planning Scheme and make recommendations designed to facilitate investment, improve investor confidence in the region and support the development and delivery of major projects, so important to the economic growth of the region now and into the future.

Yours faithfully



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## APPENDIX 1

### THINK TANK SERIES 9 PARTICIPANTS – AUGUST 2025

Name	Position	Company
Brady Sullivan	Director	Confluence Partners
Jennifer Davie	Project Planner	Covey
Kevin Covey	Principal Consultant	Covey
Evan Aldridge	Project Director	Dennis Family Corporation
Peta Harwood	State Planner	Dept of State Development, Infrastructure and Planning
Alex Hoffmann	Principal	Jackson Clements Burrows
Philippa Kelly	CEO	Large Format Retail Association
Lachlan Macgregor	Director Development Directive	Large Format Retail Association
Nicola Scott	Regional Manager	Master Builders Association
Amanda Taylor	Director	Place Design Group
Shaun Munday	Managing Director	Place Design Group
Brad Williams	Technical Director (Planning) and Sunshine Coast Office Lead	RPS AAP Consulting
Michael Shadforth	Commercial Principal/Director	RWC Northern Corridor Group
Tony Scanlon	Managing Director	Scanlon Group
Josh Sondergeld	Development Director	Stockland
David Else	Head of Master Planning	Sunshine Coast Airport
Sandy Zubrinich	Chair	Sunshine Coast Business Council
Cr Terry Landsberg	Councillor - Div 2	Sunshine Coast Council
Cr Joe Natoli	Councillor - Div 4	Sunshine Coast Council
Chris Le Serve	Chief Economic Development Officer	Sunshine Coast Council
Stephen Patey	Manager – Strategic Planning Branch	Sunshine Coast Council
Debra Robinson	Director Sustainable Growth and Planning	Sunshine Coast Council
John Baker	CEO	Sunshine Coast Council
Jason Krueger	Coordinator Planning Scheme and Projects	Sunshine Coast Council
Prof Nick Stevens	Assoc Prof & Program Co-ordinator	University of the Sunshine Coast
Prof Ross Young	Deputy Vice-Chancellor (Research and Innovation)	University of the Sunshine Coast
Melissa Griffin	Director	Urbis
Peter Saba	Group Executive, Development	Walker Corporation