

Sunshine Coast Mass Transit Action Group Inc

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1 September 2025

New Planning Scheme Project Strategic Planning Branch

Sunshine Coast Regional Council

email: [NewPlanningScheme@sunshinecoast.qld.gov.au](mailto>NewPlanningScheme@sunshinecoast.qld.gov.au)

CC Mayor Rosanna Natoli

CC Member for Kawana Jarrod Bleijie

To Whom it May Concern

Feedback to Proposed Planning Scheme 2025

We strongly oppose this draft scheme and the excessive densification of the Coastal Corridor on the basis the modelling used is well in excess of the Southeast Queensland Regional Plan (SEQRP) 2023 targets.

The SEQRP sets dwellings target of 232,000 out to 2046. This represents an additional 84,800 dwellings be provided. This is made up of a 15-year capacity requirement of 50,200 dwellings and a 10-year buffer requirement of 34,600 dwellings. Documentation provided by the Strategic Planning Team to MTAG (appendix 1) in July 2025, indicates the modelling used is adding an additional 60,000 to 97,000 dwellings to this buffer. This is between a 71% and 114% increase above the SEQRP growth target. This seems an astronomical over-reach, creating a total buffer of 95,000 to 132,000 dwellings within the 10-year timeframe (i.e. PS 2026-2036).

Rather than delivering a 25year dwelling target as set out in the SEQRP, this modelling is delivering double this, approximately 50 years.

In your email you state:

Realistic ultimate capacity: A more grounded projection that considers market conditions, development timing, land availability and infrastructure readiness. This is the benchmark used by the State Government for strategic planning.

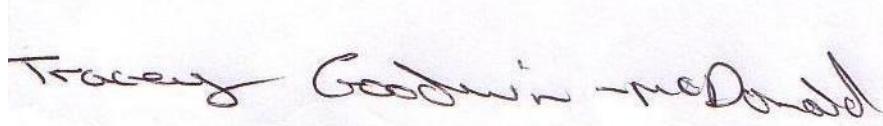
At 292,000 dwellings the realistic capacity used for this plan is 60,000 dwelling above what is required in the SEQRP. Why is this realistic capacity not closer aligned with the SEQRP targets?

We appreciate modelling is not a fine science and there needs to be room for movement. We appreciate not every block and area will be "taken up" within the planning scheme timeframe, however we would argue, this modelling goes too far. It is fool hardy to believe we know today what is required in 50 years. We would further argue there is no way any level of Government can fund and deliver infrastructure to support this level of rezoning in a timely and appropriate manner.

Further to this, once this rezoning occurs there is now way to control the pace and location of the "take up". Development will be ad hoc and piecemeal leaving residents at the mercy of developers and their preferred timings and locations. We believe this shot gun approach will lead to significant land banking and the subsequent degeneration of residential streets as developers wait for further blocks to become available and undertake no upkeep investment in the properties they have already acquired.

This proposed plan has a 10-year lifespan. The opportunity will therefore exist in 10 years' time to review the progress and dwelling requirements out another 25 years. There is no need to go so far, so quickly and cause the massive change and destruction of communities along the Coastal Corridor. The proposed plan needs to come back to a modelling that is closer to the SEQRP targets, not numbers that are fanciful future predictions with no sound basis.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Tracey Goodwin-mcDonald". The signature is fluid and cursive, with a slight shadow or reflection visible below it.

Tracey Goodwin-McDonald
President
Sunshine Coast Mass Transit Action Group Inc

Appendix 1:

Email Received 28 July 2025

Clarification on Dwelling Capacity Modelling and SEQRP Alignment

Hi Tracey,

Thank you for your follow-up enquiry regarding dwelling and population capacity modelling in the context of the Proposed Sunshine Coast Planning Scheme (proposed planning scheme). Your question is timely and important, particularly in understanding how Council's planning instruments align with the South East Queensland Regional Plan 2023 (SEQRP) projections.

Planning horizon and strategic intent

The SEQRP sets a 25-year dwelling and population target for the Sunshine Coast region (i.e. 2021 - 2046). While the proposed planning scheme has a statutory life of 10 years, it has been designed to accommodate growth well beyond this timeframe, including capacity to meet and exceed the SEQRP 2046 targets. This approach ensures flexibility, market responsiveness, and strategic alignment with long-term infrastructure planning. A similar approach has been adopted for the current planning scheme.

Planning for growth beyond projections

Planning for growth beyond population projections is a recognised best practice. It ensures that planning instruments remain resilient to market fluctuations, infrastructure delivery variability, and evolving community needs. The proposed planning scheme adopts a 2046 horizon (in line with the SEQRP) while also ensuring flexibility to accommodate growth after this time.

Key considerations include:

- Not all zoned land will be developed within the life of the planning scheme or to its full potential.
- Providing a buffer for market choice and land availability.
- Strategic alignment with long-term infrastructure and land use planning.

Models and modelling definitions

Council employs a range of models (developed both internally and by external entities) to assess both realistic and absolute ultimate capacity based on zoning allocations. These models are built on assumptions and should be interpreted with caution, as they represent artificial constructs rather than definitive outcomes. As with all modelling approaches, opinions vary widely regarding their accuracy. Stakeholders often hold competing views, with many suggesting that such models tend to underestimate rather than overstate actual capacity.

Definitions:

- **Absolute ultimate capacity:** The theoretical maximum number of dwellings achievable if all zoned land is developed to its full potential, accounting for standard constraints.
- **Realistic ultimate capacity:** A more grounded projection that considers market conditions, development timing, land availability and infrastructure readiness. This is the benchmark used by the State Government for strategic planning.

Capacity figures based on modelling

The following table summarises the key capacity figures based on the latest available modelling outputs:

| Metric | Dwellings |
|---|----------------------|
| 2021 Baseline | 147,166 |
| SEQRP 2046 Target | 231,966 |
| Proposed planning scheme and other planning instruments – Realistic ultimate capacity | ~292,000 |
| Buffer range on SEQRP 2046 Target (120–130%) | ~278,000 to ~301,000 |
| Proposed planning scheme and other planning instruments – Absolute ultimate capacity | ~329,000 |

Summary

While it may seem unusual to apply a 25-year projection within a planning instrument that has a nominal life of 10 years, this approach is both deliberate and strategic. The proposed planning scheme adopts a 2046 horizon (in line with the SEQRP) while also ensuring flexibility to accommodate growth. This methodology supports long-term strategic planning and helps future-proof the region's development framework.

We hope this provides the clarity you were seeking.

Kind regards,

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