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Strategic Planning Branch
New Planning Scheme Project
Sunshine Coast Regional Council

CC: Mayor Rosanna Natoli

CC: Member for Kawana, Jarrod Bleijie/Director General John Sosso

**Submission: Proposed Planning Scheme 2025 Fails to Deliver Strategic Outcomes
(Theme 1 – Shaping Sustainable Growth)**

To Whom it May Concern,

On behalf of the Sunshine Coast Mass Transit Action Group (MTAG), we strongly object to the Proposed Planning Scheme 2025 on the grounds that it **fails to deliver the strategic outcomes stated in the Strategic Framework (Part 2, Theme 1: Shaping Sustainable Growth, section 2.4.1).** (Figure 1)

**Figure 1. Extract Sunshine Coast Proposed Planning Scheme Strategic Framework-
Sustainable Growth**

Proposed Sunshine Coast Planning Scheme: Public Consultation Version 2025
Part 2 Strategic framework \ 2.4 Theme 1: Shaping sustainable growth

Sunshine Coast Council

2.4 Theme 1: Shaping sustainable growth

2.4.1 Key concepts

Key concepts for Theme 1: Shaping sustainable growth:

- Protecting and enhancing the Sunshine Coast's lifestyle, character and natural environment;
- Improving the liveability of our region;
- Growing mixed use activity centres;
- Integration of land use and transport to support a more compact and sustainable urban form;
- Providing new urban living opportunities within the Maroochydhore to Caloundra Coastal Corridor;
- Major new communities at Palmview, Caloundra South and Beerwah East;
- Supporting housing diversity and affordable living;
- Minimising change in established suburban neighbourhoods;
- Vibrant yet relaxed rural towns and villages, offering a hinterland living experience and character that is distinctly different to coastal areas;
- Strong and clearly defined growth management boundaries;
- Protecting a green frame of thriving natural and rural areas; and
- Sustainable and smart infrastructure networks delivered in a timely and coordinated manner; and
- Meeting the *ShapingSEQ* dwelling supply benchmarks for the Sunshine Coast.

Editor's notes —

- Section 2.4.1 Key concepts is extrinsic material under section 15 of the *Statutory Instruments Act 1992* and assists in the interpretation of the Strategic Framework.
- The Jinibara People are rekindling their Culture and are creating places and spaces where Jinibara People can live, stay and belong on Country.

There are 14 Key concepts identified. We would contend the details of the proposed plan do not deliver 7 of the 14 key concepts whilst significantly overdelivering on the dwelling supply benchmarks as set out in Shaping SEQ. Sustainable growth should be about balance and there is nothing balanced about the approach taken.

1. Protecting Lifestyle, Character and Environment

The proposed scheme forces excessive densification into established coastal suburbs, fundamentally eroding their family-oriented, low-rise character. The land area from Maroochydore to Birtinya represents less than 2% of the total land mass of the Sunshine Coast, yet is it being expected to take 25% of the new growth. To do this low-rise, residential street are being targeted for 3, 4, 6, 8 and 10 storey developments. This is completely out of character for these suburbs. The plan is seeking to protect the lifestyle, character and environment of the hinterland and northern beach areas, but destroying the coast corridor's amenity, character and lifestyle. If implemented, densities in areas such as Buddina, Mooloolaba and Maroochydore (figure 2) will be on par with those of the Gold Coast. This will turn these suburbs into the Gold Coast. How is this protecting the lifestyle, character and environment?

Figure 2; Proposed Densities of the Coastal Corridor v The Gold Coast.

Projected Population Densities vs the Gold Coast			
Population per km2			
Sunshine Coast	Current 2024	Proposed	
Mooloolaba/Alex	2,364	2,761	
Maroochydore/Cotton Tree	1,776	4,558	
Wurtulla/Buddina/Minyama	1,606	2,606	
Gold Coast	2024		
Surfers Paradise North	5,828		
Mermaid Beach	5,282		
Surfers Paradise South	5,046		
Labrador	3,903		
Coolangatta	3,740		
Southport South	2,990		
Southport North	2,596		
Source: Idprofile, SEQRP 2023, SCRC Draft Planning Scheme			

2. Improving Liveability

The Coastal Corridor already suffers traffic congestion, parking shortages, and poor participation in public transport. Council's own documents from The Mass Transit Options Analysis as well in the Proposed Kawana Waters Local Area Plan both conclude the current public transport system in the Coastal Corridor is inadequate to support the level of densification proposed. There will be no Rapid Transit Public transport system delivered in

the timeframe of this proposed planning scheme, if at all. Therefore, adding thousands of new dwellings without matching infrastructure worsens, rather than improves, liveability. Traffic congestion, on street parking, access to beach and recreational areas and general community amenity are all negatively impacted.

Further to this, in the medium and high-density residential codes there is no protection for house isolation. Therefore, there is a high probability single dwelling houses will be stuck between multi-level, multi-unit developments creating overshadowing, loss of privacy and loss of general daily amenity. This is far from improving the liveability of those living in the Coastal Corridor.

3. Integration of Land Use and Transport

Despite claiming to integrate growth with transport, the scheme directs density to the **Coastal Corridor**, based on the delivery of a non-existent “rapid transit public transport system”. This is despite the Queensland State Government confirming they have no intention of funding such infrastructure within the timeframe of this scheme, if at all. Instead they have prioritized and funded the delivery of heavy rail, and a metro style bus system known as “The WAVE” from Beerwah to Maroochydore and on to the SC Airport along the **CAMCOS corridor**. This is where land use needs to be focussed, not the coastal corridor. We are aware of shovel ready housing projects along this CAMCOS corridor that are ignored in the proposed scheme. Why?

4. Providing Urban Living Opportunities

While the scheme delivers “opportunities,” it does so in a grossly unbalanced way. The Coastal Corridor is being asked to do the heavy lifting to the point, the proposed rezoning is destroying the “village” character of the coastal suburbs in favour of total urban living. This is not what the people living in these suburbs want nor bought into. They have chosen these suburbs because they are not “urban” communities. The needs and wants of those who live here now, are being sacrificed for those who may or may not come in the future. This is disproportionate and unfair.

5. Housing Diversity and Affordability

The proposed rezoning of the Coastal Corridor will also not deliver housing diversity nor affordability. The proposed rezoning is for all multi-level, unit development at the exclusion of single dwellings and dual living options. Gentle density options are not being delivered in the majority of rezoned areas in the Coastal Corridor. So how does the excessive rezoning of the coastal corridor increase housing diversity when only multi storey, medium and high density unit blocks can be built in the majority of the rezoned areas?

Secondly, the Coastal Corridor is some of the most expensive land on the Sunshine Coast. (Refer table 1). In almost all instances, the median house and unit price in the key suburbs identified in the rezoning are above the average for the region. How with such a high cost of entry, will this deliver affordable housing?

Table 1. Median House and Unit Pricing Suburbs in the Coastal Corridor 2025

Suburb	Median House Price	Median Unit Price
Buddina	\$1,740,000	\$940,000
Minyama	\$2,825,000	\$766,000
Maroochydore	\$1,180,000	\$778,000
Mooloolaba	\$1,668,000	\$803,000
Warana	\$1,650,000	\$700,000
Sunshine Coast (Dec 2024)	\$1,110,000	\$750,000

Source: Suburb data Real Estate.com.au Aug 25, Total Sunshine Coast, ID Profile Dec 2024

Not only does the cost of entry determine a certain level of development, the extremely high cost of building today, coupled with Developer's profit expectations (and it is only developers who are likely to be building in these rezoned coastal streets), means even smaller 1- and 2-bedroom apartments are not going to be "affordable". You only have to look at the apartments that are being sold now in these areas to see the pricing expectations of Developers.

- Azzure Bokarina 2br \$855,000
- The Hedge Buddina 2br \$985,000.
- Minkara St Warana 2br \$1,000,000
- Bask Bokarina 3br \$2,299,000
- 88 Duporth Av Maroochydore 3br \$4,200,000

Source Real Estate.com.au

Further to this, as single, detached housing prices in the non-rezoned streets rise due to the now constricted supply in the Coastal Strip, unit pricing will also increase as developers seek to maintain unit relativity to house prices and increase profit margins. This has the potential to make housing in the Coastal Corridor more unaffordable than affordable.

6. Minimising Change in Established Neighbourhoods

Rather than minimising change, the scheme accelerates it. This is particularly so in the Coastal Corridor where all the rezoning is for multi-level, multi- unit developments,

3,4,6,8,10,12 and 18 storeys high. Suburbs such as Buddina, Minyama, Warana, Wurtulla, and Currimundi have nothing like this now.

7. Sustainable and Smart Infrastructure

Council have admitted the Local Government Infrastructure Plan (LGIP) is due for review and will be updated toward the end of 2025. So how can this plan be based on Sustainable and Smart infrastructure when the plan it is based on is outdated? Further to this, a great deal of the infrastructure to support the densification of the Coastal Corridor is beyond Council's control. Therefore, there appears to be large black holes regarding the delivery of the necessary infrastructure to support this plan. There is no way Council can confirm infrastructure will be delivered in a "timely and coordinated" manner with this plan. Planning for growth without knowing the level and cost of infrastructure to support its not sustainable, nor is it smart.

8. Meeting ShapingSEQ Benchmarks

This plan doesn't just meet the dwelling targets set in Shaping SEQ, it knocks them unnecessarily "Out of the Park". 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 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. This is way beyond the minimum supply that is required in the SEQRP which states:

"Maintain a minimum of 4 years approved supply and a minimum of 15 years supply of land that has been appropriately zoned and planned to be serviced" (Figure 4 below)

9. Sustainable Growth should be about Balance!

The hinterland retains protection, while coastal neighbourhoods are forced to absorb growth at unsustainable levels. There is nothing balanced at all about this proposed plan. (figure 3)

The Southern Coastal section of the Sunshine Coast is being asked to absorb way more than its fair share of growth. Representing 52% of the urban footprint, it is being allocated 72% of the growth, whilst the remainder of areas that represent 48% of the urban footprint are only getting 28% of the growth. This is even more exacerbated given almost half of this 28% is in Beerwah East which is now not progressing.

Figure 3 Urban Footprint Population Distribution

URBAN FOOTPRINT POPULATION DISTRIBUTION							
	Total	%	% in urban FP	Hectares	% Total	Population	Growth
	Hectares				of UF	Growth %	219,100
Southern Coastal section of the Sunshine Coast							
Caloundra	7,686	3.4%	93.0%	7,148	21.6%	9.0%	19,719
- Caloundra South	-					24.0%	52,584
Buderim	4,405	1.9%	99.0%	4,361	13.2%	5.0%	10,955
Kawana Waters	2,113	0.9%	96.0%	2,028	6.1%	8.5%	18,624
Maroochydore	1,836	0.8%	75.0%	1,377	4.2%	13.0%	28,483
- CBD	-	0.0%	0.0%	-	0.0%	3.0%	6,573
Mooloolaba	541	0.2%	100.0%	541	1.6%	1.0%	2,191
Sippy Downs	4,565	2.0%	38.0%	1,735	5.2%	2.0%	4,382
- Palmview structure plan				-	0.0%	7.0%	15,337
Total	21,146	9.3%	81.3%	17,190	52%	72.5%	158,848
Rest of Sunshine Coast							
Bli Bli	10,356	4.5%	7.0%	725	2.2%	1.0%	2,191
Coolum	3,106	1.4%	66.0%	2,050	6.2%	4.0%	8,764
Northshore	1,976	0.9%	74.0%	1,462	4.4%	2.0%	4,382
Eumundi	11,908	5.2%	1.5%	179	0.5%	0.5%	1,096
Yandina	13,835	6.1%	6.0%	830	2.5%	1.0%	2,191
Mooloolaha Valley	8,548	3.7%	19.0%	1,624	4.9%	1.0%	2,191
Nambour	5,485	2.4%	38.0%	2,084	6.3%	4.0%	8,764
Woombye	10,167	4.4%	8.0%	813	2.5%	1.0%	2,191
Beerwah	10,996	4.8%	46.0%	5,058	15.3%	2.0%	4,382
- Beerwah East	-			-		10.0%	21,910
Glasshouse	33,232.0	14.5%	1.4%	465	1.4%	0.3%	657
Blackhall Ranges	29,040	12.7%	2.0%	581	1.8%	1.0%	2,191
Mary Valley	68,691	30.1%	0.1%	69	0.2%	0.2%	438
Total	207,340	90.7%	7.7%	15,941	48.1%	28.0%	61,348
Grand Total	228,486	100.0%	14.5%	33,131	100.0%	101%	220,196
Note Population growth % over 100% due to rounding							

Source: SCRC proposed LGA information sheets

Figure 4: Extract SEQRP Key Regional Housing Supply Priorities P. 52

Key regional priorities



Outcomes	Strategies
Outcome 1 Efficient land use Support a consolidated urban growth pattern and higher densities in well-located places – places with access to employment, services and amenity, where land is supported by appropriate infrastructure.	1.1 Maintain a minimum 60/40 consolidation/expansion dwelling growth ratio across the region while moving towards a dwelling growth ratio of 70/30 consolidation/expansion. 1.2 Prioritise unlocking underutilised land in the Urban Footprint. 1.3 Sequence the planning and investigation of SEQ development areas to ensure alignment of land use and infrastructure planning. 1.4 Identify and prioritise sites in high amenity areas that can be developed to provide for residential densities in Table 1. 1.5 In new communities, plan for a net residential density of 20-30 dwellings/ha or 40-80 dwellings/ha if these areas are within a walkable catchment to an existing or proposed public transport station*. 1.6 Accommodate new rural residential development only in the RLA or in the Urban Footprint where land is unsuitable for urban use. 1.7 Protect PFGAs that may be needed to accommodate long-term urban growth.
Outcome 2 Housing supply Make provision for the delivery of adequate housing supply to 2046 to meet the full spectrum of housing demand.	2.1 Plan for and achieve the dwelling supply targets (including sub-targets) to 2031 and 2046 in Figure 2 and to 2046 in Figure 3 and Figure 5. 2.2 Maintain a minimum 4 years of approved supply and a minimum of 15 years of supply of land that has been appropriately zoned and planned to be serviced. 2.3 Support residential opportunities on publicly owned land to accommodate growth in the short term (including temporary uses that respond to acute demands).

Conclusion

The Proposed Planning Scheme 2025 is inconsistent with its own Strategic Framework as outlined in the document **Theme 1: Shaping Sustainable Growth**. For the Coastal Corridor, it does not protect lifestyle, does not improve liveability, does not integrate density increases with transport, does not deliver housing diversity or affordability, does not minimize change, cannot confirm if infrastructure will be delivered in a “timely and coordinated manner, goes well beyond the population growth targets set out in the Shaping SEQ and does not deliver a balanced, sustainable approach to growth.

MTAG therefore calls on Council to **rewrite the Proposed Scheme** to ensure the Strategic intent of Shaping Sustainable Growth is delivered across the whole region and does not use the Coastal Corridor as the dumping ground for future population growth at the expense of the residents who live in these suburbs now.

Only by making these changes will the Planning Scheme genuinely reflect the outcomes it promises in its Strategic Framework.

Yours sincerely,

A handwritten signature in dark ink, reading "Tracey Goodwin-McDonald". The signature is written in a cursive, flowing style.

Tracey Goodwin-McDonald

President

Sunshine Coast Mass Transit Action Group Inc