

## Draft Sunshine Coast Planning Scheme – State agency Comments for State Interest Review

The below table summarises the responses provided by state agencies on the proposed Sunshine Coast Planning Scheme and, where required, the recommended actions by DHLGPPW.

### Tiering legend

	Tier 1 – Matters that require change to the draft planning scheme
	Tier 2 – Matters that require further information or justification
	Tier 3 – Matters that require further consideration by the council

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
<b>Economic Development Queensland (EDQ)</b>				
1	EDQ (Industry) DHLGPPW	SPP – Development and Construction	Industry Use Code and Tables of Assessment  Admin definitions - Utility	<p><b>Issue – Sustainability Park:</b></p> <p>The State is concerned that under the draft planning scheme, waste facilities undertaken by a third party other than council, would not be a supported use in the industry zone, and be impact assessable, which would be inconsistent with the Regional Economic Cluster (REC) identified in ShapingSEQ 2023.</p> <p><b>Action:</b></p> <p>Amend the planning scheme to ensure that waste services, when provided by council, or a suitable third-party provider is a supported use, particularly within ‘Sustainability Park’ (Lot 504 SP322784).</p>
2	EDQ (Industry) DHLGPPW	SPP – Development and Construction	Industry Use Code and Tables of Assessment	<p><b>Issue – Inefficient use of land suitable for high-impact industry:</b></p> <p>The industry use code does not effectively protect from infiltration of incompatible low impact industry uses on land zoned for higher impact and larger scale industrial uses within industrial zones, for example car washes. This will limit the supply of land for higher impact industry.</p> <p><b>Action:</b></p> <p>Review the table of assessment for the industry zone to reduce the likelihood of low-impact industry and other similar uses which do not have the same operational requirements most suited for industrial zoned areas. Adequate land for these uses should be provided within low-impact industry and other relevant zones for these types of activity.</p>
3	EDQ	SPP – Development and Construction	Biodiversity Waterways and Wetlands Overlay	<p><b>Issue:</b></p> <p>The Biodiversity Waterways and Wetlands Overlay does not align with the current Matters of State Environmental Significance (MSES) mapping.</p> <p><b>Action:</b></p> <p>Update the Biodiversity Waterways and Wetlands Overlay to align with the States most current MSES mapping.</p> <p><i>Note: Please see further comments provided below from DOR, DES and DAF regarding MSES mapping.</i></p>
4	EDQ	SPP – Development and Construction	Flood Hazard Overlay	<p><b>Issue:</b></p> <p>The Flood Hazard Overlay map – shows a substantial amount of the Sunshine Coast Airport (SCA) Priority Development Area (PDA) as Other Flood Storage Preservation Area and the surrounding areas as Regional Flood Storage Preservation Area. Large portions of the SCA PDA are expected to be developed for urban purposes, and the resultant filling of this site will affect the flood storage capacity of the area.</p> <p><b>Action:</b></p> <p>Provide advice about how Council intend to manage the risks associated with the pending filling of land within the Airport PDA for future development.</p>
5	EDQ	SPP – Development and Construction  <i>Economic Development Act</i>	Zoning Maps	<p><b>Issue:</b></p> <p>The zoning map shows industrial zone land adjacent to the Caloundra South PDA boundary. The current PDA approval (DEV2013/469) includes a conservation and greenspace along Bells Creek North to safeguard the creek from inappropriate intrusion from various uses. However, the proposed planning scheme does not incorporate a similar buffer along this creek. Instead, it illustrates an industrial zone extending right up to the PDA boundary, which does not align with the Industrial land zoning to the east within the PDA.</p> <p><b>Action:</b></p> <p>Amend the zoning plan to include a green buffer along the northern boundary of Caloundra South PDA that aligns with the Flood Mapping Overlay. This overlay designates the land as having a high flood risk, emphasizing the need for a protective measure to align with established conservation principles and ensure the creek's resilience against potential adverse impacts.</p>
6	EDQ	SPP – Development and Construction	Part 8: Transport and parking code	<p><b>Issue:</b></p>

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				<p>The PDA development scheme refers to the planning scheme for guidance in relation to parking rates. EV charging space requirements for most of the uses are described as “Sufficient spaces to accommodate demand anticipated to be generated by development”. This lacks clarity around the rates for EV charging spaces may have an impact on the PDA in the future with regards to developers seeking to use Council’s methodology for calculating spaces.</p> <p><b>Action:</b></p> <p>Update the relevant sections of Part 8 Transport and parking code to include more detailed information as to how EV charging spaces are calculated. For examples, uses such as shopping centres should have a minimum number of spaces, with the overall number determined through a traffic report.</p>
7	EDQ DHLGPPW	SPP – Development and Construction  <i>Economic Development Act</i>	Zoning Map  Height Overlay Map	<p><b>Issue:</b></p> <p>The zoning of existing residential areas adjacent to PDAs which are intended to facilitate higher density development should encourage built form integration.</p> <p><b>Action:</b></p> <p>Review the land use zoning for areas adjacent to PDAs to ensure the built form delivered through priority development areas successfully integrate with the surrounds. For example, the area southeast and immediately adjacent to the Maroochydore CBD PDA is proposed to remain as low density residential, when high or medium density residential would be more appropriate.</p>
8	EDQ	SPP – Development and Construction  <i>Economic Development Act</i>	Schedule 2 Mapping – SC2.4 Zone Maps	<p><b>Issue – Zoning of PDAs:</b></p> <p>The declaration of a PDA creates an overriding layer of land use regulation, through the implementation of a development scheme, but does not completely remove or replace the planning scheme. Certain provisions of the planning scheme will continue to apply to the extent they do not conflict with the development schemes (the development scheme will prevail to the extent of any inconsistency). To add further complexity, other legislation recognises a planning scheme, but not necessarily a development scheme. On this basis, and while applying particular zones to land parcels within the PDA is not considered appropriate at this stage, it may be necessary to include the land within a generic zone (such as Emerging Communities zone etc) to ensure other aspects of the planning scheme can be applied to the PDA where required.</p> <p><b>Advice:</b></p> <p>Consider the zoning of PDAs to ensure aspects of development not captured by the ED Act or Development Scheme can be considered under the planning scheme.</p>
9	EDQ	SPP – Development and Construction	Part 8: Transport and Parking code	<p><b>Advice:</b></p> <p>The use “Gymnasium” has a car parking rate of 10 spaces/100m2 GFA (CAL South PDA is 5 space per 100m2) – the number is considered excessive as a Gym is not defined use and could pull in other uses that operate differently where patronage is smaller and more space is required – ie powerlifting gym, functional fitness gym where there are set class times. Consider a table within car parking rates for ‘all other uses’. Recommend that car parking rates for all other uses be 3 spaces per court or similar or 5 spaces per 100m² GFA.</p>
<b>Office of Industrial Relations (OIR)</b>				
10	OIR	SPP emissions and hazardous activities, policies 2 & 5c	All	<p><b>Issue:</b></p> <p>Chlorine gas is highly toxic, and a leak may cause deaths or serious injury in the area surrounding a chlorination facility. In many QLD local government planning schemes, water treatment plants have been developed as accepted development in the community facilities zone. They have either included chlorine gas at inception or later upgraded to use it without proper safety assessment putting the surrounding community at risk of death or serious injury if there's a leak. Chlorine facilities should be located to provide a balance between risks and the need for such facilities to be practically located. A facility storing over 2,500 kg of chlorine is a hazardous chemical facility which is State referable development. Note that both Image Flat and Landers Shute Water treatment plants use 920kg chlorine gas drums and have been located too close to surrounding houses.</p> <p><b>Action:</b></p> <p>Review the draft planning scheme and revise as appropriate to ensure utility installations involving chlorine gas are safely located, and that chlorine gas is stored in the industry standard 920 kg ("tonne") steel drums. An acceptable solution should be provided to locate a chlorine installation at least 850m from a sensitive land use or land use zone.</p>
11	OIR	SPP emissions and hazardous activities, policy 2	Table 7.21A Service Station Code - Assessment benchmarks for assessable development  Part 9: Extent of ancillary uses	<p><b>Issue:</b></p> <p>The colocation of uses such as fast-food outlets or shops with service stations unnecessarily exposes patrons of the fast-food outlet and shops, to the risk of fire or explosion at the service station. However, the State acknowledges that these uses can be suitably designed to minimise risk.</p> <p><b>Action:</b></p> <p>Include a performance outcome to the effect:</p> <p>Included or co-located ancillary uses such as shop or fast-food outlet is designed such that patrons are protected from hazard scenarios arising from service station operations including but not limited to the following features:</p> <ul style="list-style-type: none"> <li>sufficient on-site separation from hazardous activities, firewalls, vapour walls and explosion barriers protecting people from the effects of fires, explosions or flammable gas clouds, emergency exits and escape routes away from the service station hazard zones e.g. through the rear of the building and away from the forecourt/pumps.</li> </ul>

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12	OIR	Emissions and hazardous activities, policy 2,3,5, & 6	Strategic framework	<p><b>Issue – Response to SPP: Emissions and hazardous activities:</b></p> <p>Our records indicate that there are 134 locations in the SCRC area that store hazardous chemicals above Work Health and Safety Regulation manifest quantity. 76 are service stations storing flammable liquid and flammable gas that may have potential health and safety impacts on the surrounding community, another 58 include various business storing a range hazardous chemicals that may have potential health and safety impacts on the surrounding community and 6 are defined as hazardous chemical facilities under the Planning Regulation that have potentially severe health and safety impacts on the surrounding community. The specific human health and safety impacts arising from hazardous chemicals are fire, explosion and toxic dispersion, not noise, dust or odours.</p> <p>There are some partial responses to SPP emissions and hazardous activities in different parts of the strategic framework, but we recommend combining them into a specific element/theme titled emissions and hazardous activities.</p> <p><b>Reasons:</b></p> <p>Responding to SPP emissions and hazardous activities policy 2, 3, 5, &amp; 6 – there are no clear strategic outcomes that respond specifically to the risks arising from the storage of hazardous chemicals i.e. fire, explosion and toxic dispersion. There is only 1 mention of hazardous materials in the strategic framework and no reference to hazardous chemicals.</p> <p><b>Action:</b></p> <p>Include strategic outcomes that clearly respond to emissions and hazardous activities policy 2, 3, 5 &amp; 6.</p>
13	OIR	SPP emissions and hazardous activities, policy 2	Table 7.21A Service Station Code - Assessment benchmarks for assessable development  Location and site suitability  Performance outcomes	<p><b>Issue:</b></p> <p>The primary concern for the location of a service station are the health and safety impacts arising from flammable liquids – fire and explosion.</p> <p><b>Action:</b></p> <p>In response to SPP emissions and hazardous activities policy 2:</p> <ul style="list-style-type: none"> <li>Insert PO2 a): the service station is located and designed to minimise the health and safety risks to communities and individuals including the effects of fire and explosion.</li> </ul>
14	OIR	Emissions and hazardous activities, policy 5c	Overlay codes	<p><b>Issue:</b></p> <p>There are six hazardous chemical facilities (as defined in the planning regulation) in the SCRC area. These have potentially severe health and safety impacts (fire, explosion and toxic dispersion) in the surrounding community. The scheme does not include mechanisms to prevent encroachment on these existing hazardous chemical facilities.</p> <p><b>Reasons:</b></p> <p>Compliance with SPP policy 5c) noting that people within the overlay are exposed to the risk of death from fire, explosion and toxic dispersion.</p> <p><b>Action:</b></p> <p>Create a hazardous chemical facility (HCF) overlay and provisions that ensure hazardous chemical facilities are protected from encroachment from sensitive or vulnerable land uses. Separation distances are specific to each hazardous chemical facility, see table below.</p>

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15	OIR	SPP emissions and hazardous activities, policy 2	Table 7.21A Service Station Code - Assessment benchmarks for assessable development  Location and site suitability  Acceptable solutions	<p><b>Issue:</b></p> <p>A vulnerable land use is defined in State code 21: Hazardous Chemical Facilities of the State Development Assessment Provisions (SDAP) and includes uses such as childcare, health care, aged care, schools and other educational establishments and is intended to represent land uses that include people with diminished capacity to take protective actions if there is an emergency situation such as a fire in the surrounding area. These land uses require greater protection from external hazards.</p> <p>Greater than 50m separation to sensitive land use is a reasonable response to SPP Emissions and hazardous activities policy 2, if only unleaded petrol is stored, however flammable gases such as liquefied petroleum gas (LPG) or hydrogen may cause an explosion with hazardous consequences beyond 50m. Note that hydrogen vehicle refuelling is an emerging use that may occur at new or existing service stations.</p> <p>""Land use zone"" is included to cover land that may not have a current sensitive or vulnerable land use but could be developed to include one under the scheme.</p> <p><b>Action:</b></p> <p>PO2 – In addition to amenity, identify that the service station use should not impact on the safety of an existing or future planned residential area or community activity</p> <p>AS – include the following solutions:</p> <p>The service station is not located:</p> <p>(a) within 200 metres of an existing or approved vulnerable land use or land use zone, and</p> <p>(b) development not involving storage of flammable gas (e.g., liquefied petroleum gas (LPG) or hydrogen) in tanks located more than 50 metres from an existing or approved sensitive land use or land use zone, or</p> <p>(c) Development involving the storage of flammable gas in tanks (e.g., liquefied petroleum gas (LPG) or hydrogen) is located more than 100 metres from an existing or approved sensitive land use or land use zone.</p>																																																								
16	OIR	SPP - Emissions and hazardous activities, policies 2 & 5c	Schedule 1 definitions  Use definitions	<p><b>Comment:</b></p> <p>We are aware of several instances across the state where local government did not refer development of a hazardous chemical facility for a referral assessment, leading to compromised health and safety outcomes for the surrounding community.</p> <p><b>Reasons:</b></p> <p>Responding to SPP emissions and hazardous activities policy 2, 5c</p> <p><b>Action:</b></p> <p>Add a note to Table 7.12 C of the Industry Uses Code to advise that: ‘Where development involves a Hazardous Chemical Facility refer to Schedule 10, Part 7 of the Planning Regulation 2017.’</p>																																																								
17	OIR	SPP emissions and hazardous activities, policy 2	7.21 Service station use code	<p><b>Issue:</b></p> <p>Service stations store significant quantities of flammable liquids and gases and can have significant health and safety consequences outside the boundary if there is a fire and explosion.</p> <p><b>Action:</b></p>																																																								

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				In response to SPP emissions and hazardous activities Policy 2: Amend purpose statement a) to: is established at a suitable location that avoids adverse amenity <b>and health and safety impacts</b> on residential or sensitive land uses;
<b>Queensland Fire and Emergency Services (QFES)</b>				
18	QFES	SPP - Infrastructure – Infrastructure integration	Schedule 2 Mapping, Schedule 3 Designations of premises for development required under the Planning Act 2016 and Part 3 Tables of assessment	<p><b>Issue:</b></p> <p>All QFES fire and rescue sites should be zoned appropriately being Community Facilities Zone - 8. Emergency services, with the appropriate level of assessment to achieve the State Planning Policy.</p> <p>It is noted that the majority of the QFES fire and rescue site will be zoned as Community Facilities Zone - 8. Emergency services under the draft planning scheme with the exemption of Kenilworth, Maleny and Buderim.</p> <p>All QFES fire and rescue sites should be zoned Community Facilities Zone - 8. Emergency services, with the appropriate level of assessment to achieve the State Planning Policy.</p> <p>It is further noted that a use identified in an annotation on the Zone Map for the Community Facilities Zone will be Accepted development provided it is located on Council owned or controlled land.</p> <p>Development control across both Council and State owned or controlled land should be consistent, to achieve Development and construction - State owned land and zoning (5), (6) and (8) and Infrastructure integration (2) and (4) of the State Planning Policy.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>• Ensure all QFES fire and rescue sites are zoned appropriately being Community Facilities Zone - 8. Emergency services with the appropriate level of assessment.</li> <li>• Ensure the Accepted development provisions, if applicable, for Emergency services in the Community Facilities Zone are reflected appropriately.</li> <li>• Ensure all current infrastructure designations are included in the table under Schedule 3 of the draft planning scheme.</li> <li>• Clarify why there is a differentiation between Council owned or controlled land, and State owned or controlled land, in circumstances where the intended use of the land is stated.</li> </ul>
19	QFES and DHLGPPW	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policy 1	Attachment 2 – Appendix 9 – SPP Guidance Compliance Tables, section 13.1.1.1 Bushfire, Approach 5, 7 Attachment 2 – SCPS – State Interest 5.2.4.2.3 Mapping	<p><b>Issue:</b></p> <p><b>Locally refined Bushfire Hazard Overlay mapping may incorporate outdated State base maps</b></p> <p>The submitted Response to Integrating State Interests in a Planning Scheme for Bushfire, includes the statement “The Bushfire Hazard Overlay Map is based on locally-refined bushfire hazard mapping prepared as part of the risk assessment process. The process of preparing locally refined mapping has been conducted in consultation with QFES.</p> <p>As of November 2023, QFES have been preparing revisions to the SPP IMS mapping for bushfire hazard. It is anticipated that the potential use of revised QFES mapping in the proposed planning scheme will be discussed during the State interest review.</p> <p>In addition to this, the local plan provisions discuss natural hazards including bushfire hazard in their commentary on the context and setting of the local plan area.</p> <p>The Bushfire Hazard Overlay Mapping (locally defined) includes:</p> <ul style="list-style-type: none"> <li>• Very high potential bushfire intensity;</li> <li>• High potential bushfire intensity;</li> <li>• Medium potential bushfire intensity; and</li> <li>• Potential impact buffer</li> </ul> <p>Based on current estimates, the new SPP IMS Bushfire Prone Area mapping is scheduled for release in in February-March 2024. The mapping It is currently going through joint local government/QFES simplified reliability assessment with SCRC officers. This mapping will immediately supersede any bushfire hazard overlay under the planning scheme.</p> <p><b>Action:</b></p> <p>Given that the draft planning scheme is in the early stages of the Schedule 18 process, the State recommends the new SPP IMS Bushfire Prone Area mapping 2024 be integrated into the draft planning scheme, pending completion of this process and State adoption.</p>
20	QFES and DHLGPPW	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policy 1	Planning scheme section 13.1.3.2	<p><b>Issue (related to issue above)</b></p> <p><b>The draft scheme does not clearly identify whether it is using SPPIMS BPA mapping or locally refined mapping</b></p> <p>The SPP guidance for Integrating state interests in a planning scheme – Bushfire risk assessment – Step 1 – stipulates that a local government should clearly identify whether they have applied the statewide mapping or locally verified that mapping.</p> <p>It is noted that the draft scheme does not clearly identify whether it is using SPPIMS BPA mapping or locally refined mapping.</p> <p><b>Action:</b></p>



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				Amend the draft planning Scheme to state if the bushfire prone area in the planning scheme does/does not reflect the State mapping layer.
21	QFES and DHLGPPW	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policy 1	Attachment 2 – Appendix 6 – Alignment with the Building Act  Table 1.4A building assessment provisions in the planning scheme.	<p><b>Issue:</b></p> <p><b>Potential impact buffer within the Bushfire Hazard Overlay Map in Schedule 2 Mapping, is not identified as a designated bushfire prone area within Table 1.4A of the draft Planning Scheme</b></p> <p>The proposed planning scheme in (Table 1.4A) seeks to designate part of the local government area as a designated bush fire prone area for the Building Code of Australia (BCA)/Queensland Development Code (QDC) requirements (i.e. areas identified as medium, high or very high potential bushfire intensity on the Bushfire Hazard Overlay Mapping), in accordance with section 7 (Designation of area prone to bush fire) of the Building Regulation 2021.</p> <p>However, it is noted that the potential impact buffer on the Bushfire Hazard Overlay Map in Schedule 2 Mapping, is not included as a designated bush fire prone area in Table 1.4A. The State Planning Policy July 2017 (SPP) identifies bushfire prone areas as those with a medium potential bushfire intensity, high potential bushfire intensity or very high potential bushfire intensity with an additional 100 metre potential impact buffer, representing that part of the landscape that could support a significant bushfire or be subject to significant bushfire attack.</p> <p>Potential impact buffer areas comprise land adjacent to potentially hazardous vegetation that is also at risk of significant bushfire attack from embers, flames or radiant heat. Potential impact buffer areas include all land within 100 metres of areas mapped as medium, high or very high potential bushfire intensity. This 100m width was informed by findings indicating 78 per cent of fatalities occur within 30 metres and 85 per cent of fatalities occur within 100 metres of hazardous vegetation (the forest edge) in Australia (Life and house loss database description and analysis - <a href="https://publications.csiro.au/rpr/download?pid=csiro:EP129645&amp;dsid=DS2">https://publications.csiro.au/rpr/download?pid=csiro:EP129645&amp;dsid=DS2</a>).</p> <p><b>Action:</b></p> <p>Amend Table 1.4A of the draft Planning Scheme to include the identified potential impact buffer as shown on the Bushfire Hazard Overlay Map in Schedule 2, as bushfire prone area (i.e. column 2 of Table 1.4A should read Areas identified as medium, high or very high potential bushfire intensity, or potential impact buffer on the <b>Bushfire Hazard Overlay Map</b> in <b>Schedule 2 Mapping</b>).</p>
22	QFES and DHLGPPW	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policies 1, 4  Building Regulation 2021	Part 1 - About the planning scheme – Table 1.4A Building assessment provisions – column 2	<p><b>Issue:</b></p> <p>The wording of the editor's note accompanying table 1.4A is inconsistent with AS3959 National Construction Code (NCC), and the Building Code (BCA) as it currently stands.</p> <p><b>Advice:</b></p> <p>Amend the Editor's Note accompanying table 1.4A, by changing the wording "bush fire prone area" to "bushfire prone area" (bushfire as one word). The use of the single word "Bushfire" as it is used in the NCC, is also recommended throughout the scheme for consistency.</p>
23	QFES	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policies 1, 4, 5, 6	Part 6 – Overlay codes, 6.6 – Overlay Codes – Bushfire Hazard Overlay Code	<p><b>Issue:</b></p> <p>The note in Section 6.6 Bushfire Overlay Code incorrectly references the Building Regulation 2006, section 12, instead of section 7 of the Building Regulation 2021.</p> <p><b>Action:</b></p> <p>Amend the note in Section 6.6 Bushfire Overlay Code</p> <p>Note — Building development applications in a 'designated bushfire prone area' are required to meet the mandatory bushfire provisions in the National Construction Code (NCC) series, Building Code of Australia (BCA) and in AS 3959—2018 Construction of buildings in bushfire prone areas. For the purposes of the Building Regulation <del>2006</del> 2021 (section <del>42</del> 7), the NCC, the BCA and AS 3959 - 2018, 'designated bushfire prone areas' are identified as medium, high or very high potential bushfire intensity areas or potential impact buffers on the Bushfire Hazard Overlay Map.</p>
24	QFES	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policy 5	Part 6 – Overlay codes, 6.6 – Overlay Codes – Bushfire Hazard Overlay Code	<p><b>Issue:</b></p> <p>Development should have adequate road access to the site for emergency vehicles and safe evacuation in a bushfire. Accepted development and assessable development should have the same requirements.</p> <p><b>Action:</b></p> <p>Table 6.6A, R1.4, &amp; Table 6.6B, AS8 requirements should be the same, with acceptable outcomes listed in AS8 for both performance outcomes</p>

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25	QFES and DHLGPPW	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience	Part 6 – Overlay codes, 6.6 – Overlay Codes – Bushfire Hazard Overlay Code	<p><b>Issue:</b></p> <p><b>Inconsistent and unclear radiant heat flux requirements for vulnerable uses.</b></p> <p>Radiant heat flux exposure thresholds vary and should be a measure from the development footprint (building edge) to the hazardous vegetation; or from external areas where vulnerable occupants may be exposed from a fire front.</p> <p>Furthermore, no oversight of BCA provisions in the planning scheme bushfire overlay code may cause potential non-compliance in the building assessment. Under BCA provisions Vol 1, Part G, Spec 43 - separation of the certain class 9 buildings from the hazardous vegetation is to achieve radiant heat flux of <math>\leq 10\text{kw/m}^2</math>.</p> <p>This measure is consistent within the SPP Technical Reference Guide - <i>Bushfire Resilient Communities</i> document, which identifies for vulnerable uses - a development footprint plan that is separated from the closest edge to the adjacent mapped medium, high or very high potential bushfire intensity area by a distance (APZ width) that achieves a radiant heat flux level of 10 kW/m<sup>2</sup> or less at all development footprint boundaries.</p> <p>Part 3. Vulnerable uses – AS4 of the Bushfire Hazard Overlay Code stipulates that “<i>All vulnerable uses are located so that radiant heat flux is equal to or less than 3kW/m</i>”</p> <p><b>Action:</b></p> <p>Clarify in Table 6.6B, the radiant heat threshold and from what exposure, i.e. development building edge or development footprint external areas.</p> <p>Justify why the radiant heat flux threshold for Part 3. Vulnerable uses – AS4, is inconsistent with the requirements under the BCA provisions and the Bushfire Resilient Communities document.</p>
26	QFES	SPP - Planning for safety and resilience to hazards - Natural hazards, risk and resilience, Policy 5	Part 3 – Tables of assessment	<p><b>Comment:</b></p> <p>Emergency services facilities should be able to function during and immediately after a natural hazard event.</p> <p>QFES supports the inclusion of ‘emergency services use as code assessable in all zones. It is noted that most QG Emergency Services facilities are likely to use the Ministerial Designation process under the Planning Framework, however new or upgraded Rural Fire Service Stations may be triggered for planning applications.</p> <p><b>Action:</b></p> <p>This level of an assessment should also include LG provided Emergency Services facilities on Council land (e.g. SES depots).</p>
<b>Queensland Police Service (QPS)</b>				
27	QPS	SPP - Liveable communities and housing - Liveable Communities, policy 5.	Part 4 – Zones codes - 4.19 Community Facilities Zone Code - 4.19.1 Purpose	<p><b>Issue:</b></p> <p>The draft planning scheme currently includes educational establishments, hospitals, transport and telecommunication networks, and utility installations as examples of community-related uses in the purpose of the Community Facilities Zone Code. ‘Emergency services’ should be included in the purpose of the Community Facilities Zone Code as an example of a community related use.</p> <p><b>Action:</b></p> <p>Amend 4.19.1 to include ‘Emergency services’ as an example of a community related use.</p> <p><i>The purpose of the Community Facilities Zone is to provide for community-related uses, activities and facilities, whether publicly or privately owned, including, for example:</i></p> <ul style="list-style-type: none"> <li>a) <i>educational establishments; and</i></li> <li>b) <i>hospitals; and</i></li> <li>c) <i>transport and telecommunication networks; and</i></li> <li>d) <i>utility installations; and</i></li> <li>e) <b>emergency services</b></li> </ul>
28	QPS	SPP – Economic Growth - Development and construction, policy 5	Part 8 – Other development codes - 8.8 - Transport and Parking Code - Table 8.8C	<p><b>Issue:</b></p> <p>The proposed parking requirements for “emergency services” of for the minimum of 1 car space per employee is considered excessive as police stations have staff working over split shifts. Therefore, the total number of employees working at the station is far higher than will be on site at any one time. In addition, development of a Police Station or Emergency services premise always involves undertaking a detailed technical traffic and car parking study. This study and assessment will determine the necessary on-site parking based on operational needs.</p> <p>The provisions of the proposed planning scheme requiring sufficient spaces to accommodate number of vehicles likely to be parked at any one time should be maintained.</p> <p><b>Action:</b></p> <p>Amend the requirements for Emergency Services in Table 8.8C Minimum on-site parking requirements should be reverted to what was contained previously in the Sunshine Coast Planning Scheme 2014.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				Sufficient spaces to accommodate the number of vehicles likely to be parked at any one time <del>(minimum 1 space/employee)</del>
<b>Powerlink Queensland (Powerlink)</b>				
29	Powerlink	State interest: Energy and water supply – Policy 1	Part 2 - Strategic framework, 2.4.2, SO7.5	<p><b>Comment:</b></p> <p>Part 2 - Strategic framework, 2.4.2, SO7.5 refers to the general infrastructure network – means the transport, water cycle management, energy generation and distribution, waste management, information and telecommunications, environmental management, open space and social systems and facilities required to support the sustainable growth of the region.</p> <p>Major Electricity Infrastructure is shown in Map SF2B A Health and Resilient Environment – Energy, Water Supply, Wastewater and Waste Infrastructure Elements. Additionally, major electricity infrastructure is mapped within the Regional Infrastructure Overlay for a more granular assessment when required.</p> <p>Substations have not been reflected on this map. It is proposed to request that substations be shown in this overlay mapping.</p> <p><b>Action:</b></p> <p>Include substations in Map SF2B A Health and Resilient Environment – Energy, Water Supply, Wastewater and Waste Infrastructure Elements. (per comment relating to Part 6 – overlay codes below)</p>
30	Powerlink	State interest: Energy and water supply – Policy 1	Part 3 – Tables of assessment <ul style="list-style-type: none"> <li>• Table 3.2.7A – MCU – Principal Centre Zone</li> <li>• Table 3.2.12A – MCU – Low Impact Industry Zone</li> <li>• Table 3.2.13A – MCU – Industry Zone</li> <li>• Table 3.2.16A – MCU – Open Space Zone</li> <li>• Table 3.2.18A – MCU – Community Facilities zone – annotation (Table SC2.4B Community Facilities Zone annotations)</li> <li>• Table 3.2.18A – MCU – Community Facilities zone</li> <li>• Table 3.2.22A – MCU – Rural Zone</li> <li>• Table 3.6.2A – MCU – Industry Zone – Local Plan Precinct CPE LPP-3 Coolum (Quanda Road) Industrial Park North</li> <li>• Table 3.7.12A – Regional Infrastructure Overlay</li> </ul>	<p><b>Issue:</b></p> <p>The requirements for major electricity infrastructure to be accepted development are that the work only before underground high voltage sub-transmission powerlines and associated transition structures within the Principal Centre and Open Space zone – additionally for the Open Space zone can only be located on a particular lot.</p> <p>It would be difficult for Powerlink to meet these requirements as a majority of transmission lines are overhead. As a result, it should be assumed for any overhead lines that Impact assessment will be required in all zones. This is considered a reasonable position from Council as the scale of transmission lines do not lend themselves to the assessment pathway offered through development assessment and projects of this scale would generally progress through the Infrastructure Designation process for approval.</p> <p>It was found that there are more uses outlined in an annotation note for the Community Facilities zone, which includes “renewable energy facility” and “substation”.</p> <p>It is noted that the Regional Infrastructure Overlay does not change the level of assessment for uses in proximity to substations to trigger assessment against the Regional infrastructure overlay code. Once the Overlay code has been updated to include provisions for the protection of substations Table 3.7.12A should be updated accordingly.</p> <p><b>Action:</b></p> <p>Amend table 3.2.20A – table of assessment for material change use in the Innovation Zone to have ‘Battery storage facility’ and ‘renewable energy facility’ as Assessable Development subject to Code Assessment.</p> <p>Clearly input the compatible uses from the Community Facility zone – annotation into the Table of assessment for easier usability.</p> <p>Once the Regional Infrastructure Overlay is updated in accordance with the item above, amend Table 3.7.12A to include requirements for development within the identified substation buffer to have the Regional infrastructure overlay code as an assessment benchmark.</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action						
31	Powerlink	State interest: Energy and water supply – Policy 1	Part 6 – Overlay codes - 6.13 - Regional Infrastructure Overlay Code  Schedule 2 Mapping - SC2.6L - Regional Infrastructure Overlay Map	<p><b>Issue:</b></p> <p>The planning scheme includes a Regional infrastructure overlay which includes provisions that seek to limit impact on major electricity infrastructure (i.e. transmission lines) from potential encroachments and reverse amenity issues.</p> <p>There are no provisions included for the protection of substations</p> <p><u>Overlay mapping</u></p> <p>Major electrical infrastructure is identified through the Regional Infrastructure Overlay which reflects the SPP IMS mapping. The accompanying overlay code regulates development within the major infrastructure corridors.</p> <p>The Overlay map (Regional Infrastructure) reflects the State Planning Policy Interactive Mapping System and includes a buffer along major electricity infrastructure. However, the Overlay code does not reference substations. It is considered that the Overlay code should include provisions for the protection of substations.</p> <p><b>Action:</b></p> <p>update the Regional infrastructure overlay mapping to include substations as shown in the SPP IMS mapping, along with a substation buffer of at least 100 metres from a transmission substation; and</p> <p>update the Regional infrastructure overlay code to include new Performance Outcomes and Acceptable Outcomes that require that development on sites within the buffer area for major electrical infrastructure and/or substation does not adversely impact on existing or planned substations and that sensitive uses have an appropriate interface with substations – examples of Performance Outcomes and Acceptable Outcomes are outlined in Table 3.1.</p>						
32	Powerlink	State interest: Energy and water supply – Policy 1	Schedule 2 Mapping – ZM1 Zone Map	<p><b>Issue:</b></p> <p>An existing Powerlink substation in the Sunshine Coast local government area is the Palmwoods Substation – which is within the Rural zone. Substations are Assessable Development subject to Impact Assessment in the Rural Zone.</p> <p>As a result, the site should be rezoned to Community facilities to allow for substation to be a consistent use.</p> <p>There are no future or planned Powerlink Substations within the Sunshine Coast LGA identified.</p> <p><b>Action:</b></p> <p>Amend the zoning for the Palmwood substation site to be Community Facility Zone.</p>						
33	Powerlink	State interest: Energy and water supply – Policy 1	Part 8 – Other development codes – 8.5 Reconfiguring a lot code  – 8.11 Works, Service and Infrastructure code	<p><b>Comment:</b></p> <p>The Reconfiguring a Lot Code (8.5) does not include specific provisions in relation to good subdivision outcomes for electrical infrastructure, the general intent for integrated development design and lot connectivity to essential infrastructure has been included within the OOs ((8.5.1 (h)(j))).</p> <p>The code does include general provisions of sensitive land use buffers to general infrastructure, however, ideally this would need to be specific to the type of infrastructure (PO41). The Operational Works Code for cut and fill volumes and any provisions that would impact the transmission lines Works, Services and Infrastructure Code (8.11): does not include provisions specific to the impact on transmission lines. However, includes provisions that ensure development provides electrical infrastructure necessary to service premises ((8.11.2) (PO8)).</p> <p><b>Action:</b></p> <p>Amend the Reconfiguring a Lot Code to include specific design requirements for subdivisions where the site is within the buffer areas for major electricity infrastructure and/or a substation – examples of Performance Outcomes and Acceptable Outcomes are outlined below:</p> <table><tr><th>Performance outcomes</th><th>Acceptable outcomes</th></tr><tr><td>PO1 Lot reconfiguration integrates major electricity infrastructure within the overall neighbourhood layout. In particular, the neighbourhood design:  <div><div>1.</div><div>ensures land of sufficient size and suitability is allocated to accommodate the existing and future major infrastructure network;</div><div>2.</div><div>as far as possible, minimises the likely visual prominence of major electricity infrastructure; and</div><div>3.</div><div>provides for an interface or relationship with surrounding uses that minimises the potential for reverse amenity and safety concerns.</div></div></td><td>AO2 A minimum 5 metre wide densely planted landscaped buffer is provided, including provision for advanced trees and shrubs that will grow to a minimum height of 10 metres.  AO3: The number of lots within an easement is not increased.</td></tr><tr><td>PO2 Landscaping is provided which substantively assists in screening and softening poles, towers or other structures and equipment associated with major infrastructure.</td><td></td></tr></table>	Performance outcomes	Acceptable outcomes	PO1 Lot reconfiguration integrates major electricity infrastructure within the overall neighbourhood layout. In particular, the neighbourhood design:  <div><div>1.</div><div>ensures land of sufficient size and suitability is allocated to accommodate the existing and future major infrastructure network;</div><div>2.</div><div>as far as possible, minimises the likely visual prominence of major electricity infrastructure; and</div><div>3.</div><div>provides for an interface or relationship with surrounding uses that minimises the potential for reverse amenity and safety concerns.</div></div>	AO2 A minimum 5 metre wide densely planted landscaped buffer is provided, including provision for advanced trees and shrubs that will grow to a minimum height of 10 metres.  AO3: The number of lots within an easement is not increased.	PO2 Landscaping is provided which substantively assists in screening and softening poles, towers or other structures and equipment associated with major infrastructure.	
Performance outcomes	Acceptable outcomes									
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PO2 Landscaping is provided which substantively assists in screening and softening poles, towers or other structures and equipment associated with major infrastructure.										

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action		
				PO3 Reconfiguration does not intensify development within an easement for major electricity infrastructure in a way that would reduce ease of access to the infrastructure by the responsible entity.		
				PO4 Where the reconfiguration has major electricity infrastructure, the easement is incorporated within a useable public open space network wherever possible.	No acceptable outcome provided	
				PO5 Where major electricity infrastructure is located within public open space, the dimensions and characteristics of the open space area are sufficient to accommodate the electricity easement or site, in combination with compatible recreational facilities and landscaping, so that:  <div><div>1.</div><div>it has an open and expansive character, with landscape design which assists in breaking up the linear and vertical dominance of the infrastructure;</div><div>2.</div><div>landscaping is located outside the easement area and substantively screens and softens the appearance of poles, towers or other structures; and</div><div>3.</div><div>recreational facilities and landscaping are compatible with the electricity infrastructure, having regard to safety, height, the conductivity of materials and access to the electricity infrastructure by the electricity provider.</div></div>	No acceptable outcome provided	
				AO6 Where major electricity infrastructure is to be located in a road:  <div><div>1.</div><div>an attractive, functional and safe streetscape is achieved;</div><div>2.</div><div>street furniture, planting and lighting are compatible with the electricity infrastructure, having regard to safety, height, the conductivity of materials;</div><div>3.</div><div>the reserve has sufficient width to accommodate significant landscaping which assists in screening and softening poles, towers or other structures and equipment from nearby sensitive land uses;</div><div>4.</div><div>the clearances required under schedules 4 and 5 of the Electrical Safety Regulations 2013 can be achieved; and</div><div>5.</div><div>convenient access to the infrastructure by the electricity provider is maintained.</div></div>	No acceptable outcome provided	
Energy Queensland						
34	Energy QLD	SPP – Infrastructure - Energy and water supply, Policy 1	Schedule 2 Mapping - Regional Infrastructure Overlay Map - OM12(ii) Major Electricity Infrastructure	<b>Issue:</b> We commend Council on identifying the existing and approved Major Electricity Infrastructure and distinguishing between Powerlink & Energex. However, we suggest including all substation sites, as per the SPP policy (1) all, which can be identified through the relevant QSpatial data set.  <b>Action:</b> Include existing and approved substation sites on map OM12(ii) and provide appropriate provisions to regulate development		
35	Energy QLD	SPP – Infrastructure - Energy and water supply, Policy 1	Part 6 – Overlay Codes - 6.13 - Regional Infrastructure Overlay Code	<b>Issue:</b> The proposed Overlay Code includes 2 provisions regarding setbacks and avoiding easements. AS3 & AS4 in the Overlay Code relate to protecting major electricity infrastructure. First, we note that not all major electrical lines are covered by an easement, and it may be difficult for developers to know if they're 'otherwise affected' by electricity. This provision may be better worded if it referred to the mapped electricity lines and buffer, or worded so that 'Development maintains the clearances required under Schedules 4 and 5 of the Electrical Safety Regulations 2013 or the current relevant standards  Secondly, there are other issues such as avoiding new lots in easements, reverse amenity, landscaping, building orientation, earthworks and stormwater management which should be addressed in the Overlay Code. We acknowledge there are provisions in the RoL and Works Services & Infrastructure Code that partly address these issues. But we suggest including further provisions from the model code to help avoid incompatible development around substations and major electricity lines.  <b>Action:</b> Include further assessment provisions, as outlined in the SPP guideline on Energy and Water supply model code.		

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
36	Energy QLD	SPP – Infrastructure - Energy and water supply, Policy 1	Levels of Assessment - Tables 3.2 Material Change of Use	<p><b>Issue:</b></p> <p>The SPP asks whether the lowest appropriate level of assessment is applied to major electricity infrastructure and Council's response has been that development for a Utility installation (local utility) is accepted development in all zones. Whilst we appreciate Council minimising the red tape to create electricity infrastructure and listing 'the reticulation of power' in the Local utility administration definition, it is unclear how this would be applied when electricity isn't listed in the Utility land use definition. Our preference would be to have the land use definitions of Substation and Major Electricity Infrastructure listed in each zone, with a cascading level of assessment. For example, Substation and Major Electricity Infrastructure would be Accepted in Community Facilities and Industrial zones, Code assessable in Rural type zonings and Impact assessable in Residential and Centre zones.</p> <p><b>Action:</b></p> <p>Amend the Tables of Assessment to specifically address Substations and Major Electricity Infrastructure in each zone.</p>
<b>Department of Environment, Science and Innovation (DESI)</b>				
37	DESI, DOR and DHLGPPW	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps  Caloundra and Surrounds Local Plan	<p><b>Issue – Zoning inconsistent with mapped matters of State Environmental Significance (MSES):</b></p> <p>Lot 1 on RP165675 and lot 1 on RP127039 are zoned as Emerging Community under the proposed planning scheme. The sites contain significant areas of MSES, including regulated vegetation and core koala habitat. DHLGPPW is concerned that the proposed zoning, site specific provisions within the planning scheme, and other legislation make development of this land unviable. The emerging community zone was not designed to be applied to address small, difficult sites like these ones. The council is to reconsider the zoning of the land to an appropriate urban or non-urban zone that reflects the development potential. All areas of MSES on the subject site should be included in the Environmental Management and Conservation zone.</p> <p><b>Action:</b></p> <p>Reconsider and amend the proposed 'Emerging Community' zone, considering development constraints, to provide some certainty for landowners.</p> <p>All areas of MSES on the subject site should be included in the Environmental Management and Conservation zone.</p>
38	DESI and DOR	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Zoning inconsistent with mapped MSES:</b></p> <p>The following sites, which are proposed to be zoned as 'Open space' contain MSES and waterways.</p> <ul style="list-style-type: none"> <li>• Lot 90 on SP298058 MSES - <i>regulated vegetation (essential habitat), wildlife habitat, koala habitat and a defined watercourse</i></li> <li>• Lot 900 on SP290327 MSES - <i>wildlife habitat, regulated vegetation (category B), HES wetland, koala habitat and a defined watercourse</i></li> <li>• Walkers Creek (road reserve south of lot 0 on SP220423) MSES – <i>Riverine vegetation and a defined watercourse</i></li> <li>• Lot 105 on SP289968 MSES – <i>Riverine vegetation and a defined watercourse</i></li> </ul> <p>The waterways and associated MSES on these sites mean they are inappropriate for the accepted uses of the Open Space Zone, and any development would lead to unacceptable clearing of MSES vegetation.</p> <p><b>Action:</b></p> <p>Amend the zoning of the lots listed above to be 'Environmental Management and Conservation' to protect from inappropriate development or future clearing of MSES.</p> <p><i>Note partial/split zoning is acceptable for Lot 105 on SP289968, with MSES areas on site zoned as EMC.</i></p>
39	DESI and DOR	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Zoning inconsistent with mapped matters of State significance (MSES):</b></p> <p>Lot 4 on RP226617 is zoned as Community Facilities (#7 Educational Establishment) under the proposed planning scheme. Much of the areas not already developed are habitat for endangered wildlife (including core koala habitat), habitat for special least concern animals, and remnant vegetation that is endangered or of concern.</p> <p><b>Action:</b></p> <p>Zone the undeveloped portion of the site, containing MSES, as Environmental Conservation Zone to prevent future clearing and encroachment.</p>
40	DESI and DoR	SPP - SPP – Natural hazards, risk and resilience	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Zoning inconsistent with mapped MSES:</b></p> <p>The following sites located are zoned for potentially incompatible urban purposes.</p> <ul style="list-style-type: none"> <li>• Lot 2 on RP107173 – Partially zoned 'Open Space'</li> <li>• Lot 33 on SP290977, lot 20 on SP324425 and lot 12 on SP293324– Zoned as Sport and Recreation</li> </ul> <p>The above sites have been identified by council as being located in an area critical for region wide flood storage. Additionally, the sites are mapped as significant Erosion Prone Areas, as identified in Council's Coastal Hazard Overlay and SPP Mapping.</p> <p>The allocation of severely flood prone land, for parks, or sport and recreation, given council's minimum standards of service and associated infrastructure (e.g. clubhouses, parking, access, field immunity and drainage, etc.) is likely to lead to filling of this land.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action								
				<b>Action:</b> Reconsider the rezoning of this lot to reflect the intended outcomes for the area.								
41	DESI and DoR	SPP - SPP – Natural hazards, risk and resilience	Schedule 2 - SC2.4 Zone maps	<b>Issue – Zoning inconsistent with mapped matters of State significance (Erosion Prone Areas, MSES and Fish Habitat Area):</b> Lot 300 on RP865231, proposed to be zoned ‘Limited development’, is adjacent to the Maroochy River and heavily constrained by coastal hazards (Erosion Prone Area, storm tide inundation, permanent tidal inundation area (Highest Astronomical Tide at 2100). It contains MSES Wildlife habitat (EVR, SLC, Koala habitat), Regulated veg (Cat B, Essential habitat). The lot also provides an area for ecological retreat from sea level rise.  A zoning of ‘Limited development’ may allow for development incompatible with the site constraints. <b>Action:</b> Consider amending the zoning of land in the erosion prone area to be Environmental Conservation and Management. The balance of the lot landward of the EPA may be retained as Limited Development.								
42	DESI and DoR	SPP - SPP – Natural hazards, risk and resilience	Schedule 2 - SC2.4 Zone maps	<b>Issue – Zoning inconsistent with mapped matters of State significance (Erosion Prone Areas, MSES and Fish Habitat Area):</b> Lots 2 and 3 on RP90264, lot 1 on RP96774 and lot 1 on RP98356 are zoned ‘Limited development’ under the proposed planning scheme. The lots are adjacent to the Maroochy River and heavily constrained by coastal hazards (Erosion Prone Area, storm tide inundation, permanent tidal inundation area (Highest Astronomical Tide at 2100). The lots contain MSES Wildlife habitat (EVR, SLC, Koala habitat), Regulated veg (Cat B, Essential habitat) and provide an area for ecological retreat from sea level rise.  This land is severely affected by flooding and coastal MSES, and a zoning of ‘Limited development’ may encourage future uses which are incompatible with the site constraints. <b>Action:</b> Amend the zoning of the subject lots to Environmental Management and Conservation  Or Provide sufficient evidence and reasoning for including the lots in the limited development zone.								
43	DESI	SPP – Environment and heritage – Biodiversity, Policy 2	Schedule 2 – Mapping – Map OM4(ii) - Matters of State Environmental Significance (MSES)	<b>Issue:</b> The current mapping for MSES does not meet the methodology outlined in Appendix D of the MSES Methodology and definition (l)(v) within the definition for MSES under the SPP. <b>Action:</b> MSES Regulated Vegetation (intersecting a watercourse) requires to be remapped in accordance with the methodology in Appendix D – MSES Methodology								
44	DESI	Water Quality State Interest	6.5.2 Requirements for accepted development  Table 6.5B Separation distances for dwelling houses to waterways and wetlands other than canals and artificial waterways  Table 6.5D Separation distances for a rural activity to waterways and wetlands	<b>Issue:</b> To better achieve the water quality state interest in protecting and enhancing the environmental values and water quality of Queensland waters and reflect best practice, Section 11.1.3 Approach to plan-drafting for the Integrating state interests in a planning scheme Guidance for local governments should be incorporated. <u>Relevant text from Section 11.1.3 for reference:</u> <b>Where land is near waterways and MSES High ecological significance wetlands and MSES - High ecological value waters (wetland):</b> Is the size of zones or locally specific mapping informed by recommended separation distances to avoid adverse impacts on EVs? For example, buffers around wetlands of a default 50 metres in urban areas and 200 metres in non-urban areas. <b>Where land includes EVs of waterways, wetlands, natural drainage lines and landform features as well as high risk soils:</b> Is the size of zones or locally specific mapping informed by recommended separation distances to avoid adverse impacts on EVs? For example:  <b>Distance from defining banks of watercourses and drainage features</b> <table><tr><td>Stream Order</td><td>Distance from the defining bank of a watercourse or drainage feature (metres)</td></tr><tr><td>1 or 2</td><td>10</td></tr><tr><td>3 or 4</td><td>25</td></tr><tr><td>5 and above</td><td>50</td></tr></table>	Stream Order	Distance from the defining bank of a watercourse or drainage feature (metres)	1 or 2	10	3 or 4	25	5 and above	50
Stream Order	Distance from the defining bank of a watercourse or drainage feature (metres)											
1 or 2	10											
3 or 4	25											
5 and above	50											

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action		
				<b>Action:</b> Review the buffers in <b>Table 6.5B Separation distances for dwelling houses to waterways and wetlands other than canals and artificial waterways</b> for stream order 3 and above and wetlands and consider adding a row for > stream order 5 to incorporate Section 11.1.2 Approach to plan drafting.		
				Waterway type/ wetland	Separation distance in an urban zone	Separation distance in a nonurban zone
				Stream order 1 and 2	10m	10m
				Stream order 3 and 4 and above	25m	50m
				Stream order 5 and above	50m	100m
				Wetland	•50m, where on a lot not exceeding 3,000m² in area; or •100m, where on a lot exceeding 3,000m² in area.	200m
45	DESI	SPP – Natural hazards, risk and resilience	Planning Scheme Part 2 Strategic framework  2.5 A healthy and resilient environment  Element 6 Flooding and coastal hazards	<b>Issue:</b>  The current wording limits development restrictions to open coast locations only. This supports development in riverine erosion prone areas (e.g. 40m + HAT, sea level rise) without mitigation, which is inconsistent with the SPP.  <b>Action:</b>  SO6.7 and SO6.8 needs to reference coastal erosion more broadly, not just open coast erosion. Note: s13.1.4.4 (Approach 2) of the SPP Guidance Compliance Table states that strategic outcomes avoid urban expansion into non-urban areas within an erosion prone area, however it has only been avoided on the open coast.		
46	DESI	SPP – Natural hazards, risk and resilience	Planning Scheme Part 3 Tables of assessment  3.7.6 Coastal Hazards Overlay	<b>Issue:</b>  Coastal protection works on the open coast would be captured in Part 3 Tables of assessment but such works adjacent to rivers/creeks would not.  <b>Action:</b>  The first column of Table 3.7.6A must also capture the default 40m + HAT component of the erosion prone area		
47	DESI	SPP – Natural hazards, risk and resilience	Planning Scheme Part 6 Overlay codes  6.7 Coastal Hazards Overlay Code	Only open coast erosion areas are referenced here, which means development in the erosion prone area adjacent to riverine areas is not appropriately regulated.  <b>Action:</b>  Part 2: Coastal erosion performance outcomes must include areas within the default 40m+HAT component of the erosion prone area  <b>Advice:</b>  Note that in Table 6.7A accepted development does not apply to areas adjacent to rivers/creeks as the requirements do not reference the default 40m+HAT component of the erosion prone area, which applies to areas where the erosion distance has not been calculated.		
48	DESI	SPP – Environment and heritage –	Schedule 1 – Definitions - Essential	<b>Issue:</b>  The full list of MSES is not represented in this table.		



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		Biodiversity, Policy 2	environmental Infrastructure	<b>Action:</b> Amend this definition to refer to the State definition of MSES.
49	DESI	Nature Conservation (Koala) Conservation Plan 2017	Schedule 1 - Definitions – Koala habitat tree	<b>Issue:</b> The planning scheme definition for a 'koala habitat tree' should align with the regulation's definition. <b>Action:</b> Amend this definition be the same as the definition for 'koala habitat tree' in the Nature Conservation (Koala) Conservation Plan 2017 schedule 2 Dictionary or refer this definition to the above regulation.
50	DESI	SPP – Environment and heritage – Biodiversity, Policy 3	Schedule 1 - Definitions – Matters of Local Environmental Significance	<b>Issue:</b> Part (b) of this definition refers to areas which contain or are likely to contain species that are locally endangered or threatened. Further information needs to be provided on what those species may be to ensure they are not MSES or MNES. <b>Action:</b> Amend the definition of Matters of Local Environmental Significance to refer to an external list or Planning Scheme Policy that details which species council considers meet criteria (b).
51	DESI	SPP – Environment and heritage – Biodiversity, Policy 3	Part 6 – Overlay Codes - 6.5 Biodiversity, Waterways and Wetlands Overlay Code	<b>Issue:</b> The methodology for MLES was not provided to a detail required for DESI to confirm that the proposed MLES is not the same or substantially the same as MSES and MNES. DESI notes that there are administrative definitions provided for some MLES however, explanations for each MLES were only briefly described in Council's response to the SPP guidance document. Therefore, it is unknown if MLES such as 'core habitat areas' do not include MSES species habitat or if MLES natural wetlands do not include wetlands designated as MSES. Furthermore, MLES Core Habitat in the response to the SPP guidance refers to 'large areas of intact native core vegetation' so it is unclear which species habitat this layer refers to or if 'core native vegetation' is a more appropriate name for this MLES. <b>Action:</b> Provide a detailed methodology for MLES and include a link within the code or administrative definitions to where users may view the methodology.
52	DESI	<i>Environmental Offsets Act 2014: Sections 8, 10,14 and 15.</i>	Part 6 – Overlay Codes - 6.5 Biodiversity, Waterways and Wetlands Overlay Code – 6.5.1 Purpose (f)	<b>Issue:</b> The terminology and references to environmental offsets in part (f) of the purpose statement does not comply with the <i>Environmental Offsets Act 2014</i> <b>Action:</b> Amend to: “(f) provides for environmental offsets that <del>compensate for counterbalance</del> unavoidable impacts on prescribed MLES to be used as a last resort only, when <del>adverse</del> significant residual impacts cannot reasonably be avoided, or minimised and mitigated. <del>Proposing to deliver an environmental offset does not mean proposals with unacceptable impacts will be approved.</del> ”
53	DESI	SPP – Environment and heritage – Biodiversity, Policy 2	Part 6 – Overlay Codes - 6.5 Biodiversity, Waterways and Wetlands Overlay Code  - 6.5.3 Biodiversity, Waterways and Wetlands Overlay Code, PO1  - 2.5.2 Strategic Outcomes, SO1.2	<b>Issue</b> Council's proposed definition of essential environmental infrastructure includes MSES and MNES. Despite the information in the Editor's Note that highlights potentially competing State requirements, MSES is supposed to be avoided and mitigated and there are no allowances for when there is 'an overriding community need'. Additionally, despite the note, if MSES was cleared under this PO (if it did not trigger a state code) then there appears to be an expectation that an offset can be provided. Although this is cleared up in Part 6 of the same code, there is no link to the further restrictions in Part 6. <b>Action</b> Amend PO1 and SO1.2 to ensure that MSES is not allowed to be impacted by development that meets council's definition of an 'overriding community need in the public interest'. This rule is applicable to all parts of the draft planning scheme. Note: DHLGPPW has advised the council to remove the requirement to demonstrate an overriding community need in the public interest.
54	DESI	SPP – Environment and heritage – Biodiversity, Policies 2 & 3	Part 6 – Overlay Codes - 6.5 Biodiversity, Waterways and	<b>Issue:</b> As Essential environmental infrastructure includes MSES, additional information as to what a 'significant area' means is needed for improving transparency in this PO. <b>Action:</b>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			Wetlands Overlay Code - 6.5.3 Biodiversity, Waterways and Wetlands Overlay Code, PO3	PO3 is ambiguous with regards to what constitutes a 'significant area'. Council should consider providing additional detail in the associated PSP.
55	DESI	SPP State Interest Cultural Heritage Policy 4	Local heritage register	<p><b>Issue:</b></p> <p>The statements of local cultural heritage significance, required by SPP State Interest Cultural Heritage Policy 4, are located within the associated planning scheme policies (PSP). While the State appreciate that council has advised that the PSPs are not currently available, for the purposes of this state interest, it is unclear whether any sites will be added or deleted from the local heritage register compared to the recent 2020 amendment.</p> <p><b>Action:</b></p> <p>Provide any available information regarding new or deleted sites from the local heritage register.</p>
56	DESI	<i>Environmental Offsets Act 2014</i> : Section 3 (Purpose of Act), 7 (What is an environmental offset), Sections 8 (What is a significant residual impact)	Part 6 – Overlay Codes - 6.5 Biodiversity, Waterways and Wetlands Overlay Code  - 6.5.3 Biodiversity, Waterways and Wetlands Overlay Code, PO12	<p><b>Issue:</b></p> <p>The update is required to comply with the <i>Environmental Offsets Act 2014</i>. The main purpose of the <i>Environmental Offsets Act 2014</i> is to counterbalance significant residual impacts – therefore aiming to achieve a 'no net loss'. A net gain outcome from the offset itself (e.g. in terms of its scale and condition gain requirements) is currently prevented under the <i>Environmental Offsets Act 2014</i>.</p> <p><b>Action:</b></p> <p>Amend PO12 as follows</p> <ol style="list-style-type: none"> <li>minimises and mitigates <b>adverse significant residual</b> impacts on ecological values, landscape amenity and character values to the greatest extent practicable; and</li> <li>provides an environmental offset for the area that is adversely affected by the development that:               <ol style="list-style-type: none"> <li>results in <b>a net environmental benefit no net loss of native vegetation</b> within a short timeframe;</li> <li>is located on the development <a href="#">site</a>, another <a href="#">site</a> that has a nexus with the development <a href="#">site</a> or a <a href="#">site</a> that is within a rehabilitation focus area;</li> <li>is supported by appropriate management and funding arrangements to ensure the ongoing viability of the offset; and</li> <li>is not used for material or commercial gain</li> </ol> </li> </ol>
57	DESI	<i>Environmental Offsets Act 2014</i> : Sections 8, 10, 14 and 15.	6.5 Biodiversity, Waterways and Wetlands Overlay Code - Part 6 Environmental Offsets	<p><b>Issue:</b></p> <p>Part 6: Environmental offsets requires updating to comply with the <i>Environmental Offsets Act 2014</i>.</p> <p><b>Action:</b></p> <p>Replace "compensate" with "counterbalance"</p> <p>Replace "significant impacts" and "adverse impacts" with "significant residual impacts"</p> <p>Insert at end "which are not the same or substantially the same as a matter of state or national environmental significance."</p>
58	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code, Table 6.5A Requirements for accepted development, Part 1: Dwelling houses	<p><b>Issue:</b></p> <p>The current nominated separation distance of 25m for lots over 3000m<sup>2</sup> may be appropriate for smaller lots, however this is also the default for larger urban zoned lots. State code 9: Great Barrier Reef wetland protection areas (State code 9) of the SDAP requires a buffer of 50m to development in urban zones (AO1.1). A 50m buffer between development and a wetland on lots over 1ha would provide greater protection to wetland values and be more appropriate in an accepted development code.</p> <p><b>Action:</b></p> <p>Review R2.1, Table 6.5B Separation distances for dwelling houses to waterways and wetlands other than canals and artificial waterways, Wetland separation distance, to include a third Separation Distance (column 2) of 50m for development on lots greater than 1ha (10000m<sup>2</sup>).</p>
59	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code, Table 6.5A Requirements for accepted	<p><b>Issue:</b></p> <p>The current nominated separation distances of 10m for animal husbandry (except poultry) or 25m for other activities is insufficient to ensure impacts on wetlands are avoided. State code 9 requires a buffer of 200m to development in non-urban zones (AO1.1) which is more appropriate in an accepted development code.</p> <p><b>Action:</b></p>


Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			development, Part 2: Rural activity	Review R2.2, Table 6.5D Separation distances for a rural activity to waterways and wetlands, Wetland separation distance (column 2), from “10m” and “25m” to be 200m from the wetland for all agricultural activities.
60	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code, Table 6.5A	<p><b>Issue:</b></p> <p>Currently, the Biodiversity, Waterways and Wetlands Overlay Code only provides requirements for accepted development if it is a ‘dwelling house’. However, other potential accepted development in the turtle sensitive nesting area includes (for example) use of existing building for a bar or office, and new development for community care centre, community use, park or utility installation. All of these developments are likely to include some form of lighting, which should be kept to a minimum and not be directed toward the coast to minimise impacts to nesting sea turtles.</p> <p><b>Action:</b></p> <p>R1.5, which relates to requirements for accepted development in a sea turtle nesting sensitive area, should apply to all accepted development not just “dwelling house”.</p>
61	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code  Part 8: Priority Species – sea turtles	<p><b>Issue:</b></p> <p>There is potential for further development of tall buildings within sea turtle nesting sensitive areas that rise above the treeline and other vertical barriers. The below addition is recommended to clarify that acceptable external lighting must avoid casting light on the beach or toward the coast.</p> <p><b>Action:</b></p> <p>Suggest clarification of AS15.2 to clarify that acceptable external lighting must avoid casting light on the beach or toward the coast, for example by making the addition below:</p> <p>All external lighting, including on balconies and rooftop terraces and in public spaces:</p> <p>(a) is true amber or PC amber LED, with no blue or violet wavelength;</p> <p>(b) is directed downward using directional fittings such that light is prevented from shining above the horizontal plane;</p> <p>(c) has a defined focal area to reduce light spill beyond the target area <u>or onto the coast</u>;</p> <p>(d) is shielded by minimum 30cm vertical shields (or the fitting is engineered to provide the same degree of shielding), or is recessed and mounted under eaves, verandas or the roofline;</p> <p>(e) is the minimum intensity required to illuminate the area;</p> <p>and</p> <p>(f) is fitted with light motion detection sensors and/or timers to ensure lighting is turned off when not required.</p>
62	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code  Part 8: Priority Species – sea turtles	<p><b>Issue:</b></p> <p>Acceptable solutions should articulate specific measures.</p> <p><b>Action:</b></p> <p>Recommend further clarification of how to ‘reduce’ sky glow and light trespass in AS19.3 or refer to policy if covered in that document.</p>
63	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code  Part 8: Priority Species – sea turtles	<p><b>Issue:</b></p> <p>It is currently unclear what PO17 of the Biodiversity, Waterways and Wetlands Overlay Code is trying to achieve, the intent requires clarification.</p> <p><b>Action:</b></p> <p>Recommend converting the alternative acceptable solution for new beach access points (“new beach access points are only established where...”) under AS17 into the performance outcome.</p> <p>OR</p> <p>If seeking to allow for a small net increase in the total number of beach access points, expand PO17 to clarify the need to minimise both the number and impact of the new access points.</p>
64	DESI	SPP Biodiversity Policy 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code  Part 8: Priority Species – sea turtles	<p><b>Issue:</b></p> <p>Acceptable solutions should be specific. Recommend deleting ‘including’ before the list of measures. If alternative measures meet the intent, they should be assessed with consideration to the performance outcome.</p> <p><b>Action:</b></p> <p>Delete ‘including’ before the list of acceptable measures in AS20.1, as shown below:</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<p>Illuminated signage is avoided.</p> <p>OR</p> <p>Where development involves illuminated signage, the sign and any associated lighting is positioned and operated to minimise sky glow and light spill, including through the following measures:</p> <p>(a) reduced intensity lighting;</p> <p>(b) use of long wavelength lights;</p> <p>(c) use of shielded lighting; and</p> <p>(d) directing lighting downwards and onto areas of interest (no uplighting).</p>
65	DESI	SPP Biodiversity Policies 1 and 2	6.5 Biodiversity, Waterways and Wetlands Overlay Code	<p><b>Issue:</b></p> <p>To ensure consistency with the policy outcomes in the Biodiversity State Interest in that development minimising and avoids impacting these values matters of national and state environmental significance should be included in the Purpose statement.</p> <p><b>Action:</b></p> <p>Add matters of national and state environmental significance to part (d) of the Purpose statement.</p>
66	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014</i> : Sections 8, 10,14 and 15.  Environmental Offsets Regulation 2014: Section 5	2.5.2 - Strategic Outcomes SO1.3	<p><b>Issue:</b></p> <p>Although this is explained in subsequent POs, the inclusion at the Strategic Outcome level is necessary to eliminate any confusion.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>replace "adverse impacts" with "significant residual impacts"</li> <li>insert "Proposing to deliver an environmental offset does not mean proposals with unacceptable impacts will be approved."</li> <li>amend to limit the offset trigger to matters of local environmental significance.</li> </ul>
67	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014</i> : Sections 8, 10,14 and 15.  Environmental Offsets Regulation 2014: Section 5	<p>Part 5 Local plans</p> <p>Coastal local plans</p> <p>Caloundra and Surrounds Local Plan</p> <p>Part 14 - Development in the Emerging Community Zone (Pelican Waters Golf Course)</p> <p>PO77</p>	<p><b>Issue:</b></p> <p>Updates to Part 5: Local plans and Coastal local plans requires updating to comply with the <i>Environmental Offsets Act 2014</i>.</p> <p><b>Action:</b></p> <p>Replace PO77(b) with -</p> <ol style="list-style-type: none"> <li>avoids significant residual impacts</li> <li>minimises and mitigates significant residual impacts where avoidance is not possible</li> <li>does not result in a significant residual impact unless the significant residual impact is acceptable, and an offset is provided (where appropriate).</li> </ol> <p>Amend to limit the offset trigger to matters of local environmental significance which are not the same or substantially the same as a matter of state or national environmental significance.</p>
68	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014</i> : Sections 3 and 7	8.9 Vegetation Management Code – 8.9.1 Purpose	<p><b>Issue:</b></p> <p>Consistent terminology is required within the scheme (where 'Environmental offset' is used) and as per the <i>Environmental Offsets Act 2014</i> to distinguish these offsets from other offsets.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>replace (e) "biodiversity offset" with "environmental offset"</li> <li>insert where vegetation clearing is "acceptable" and cannot be practically avoided and otherwise minimised and mitigated.</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
69	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014: Section 8</i>	8.11 – Works, services and infrastructure code  Part 2: Infrastructure, services and utilities AS9.4	<b>Issue:</b> To apply an offset under the <i>Environmental Offsets Act 2014</i> , an applicant must first demonstrate that they have attempted to avoid, minimise and mitigate the impact. An applicant cannot just choose to comply with the second element of this AS. <b>Action:</b> Insert - i. avoids significant residual impacts; ii. minimises and mitigates significant residual impacts where avoidance is not possible iii. does not result in a significant residual impact unless the significant residual impact is acceptable, and an offset is provided (where appropriate)... in accordance with the following:"
70	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014: Section 8</i>	Part 4 Zones codes Environmental zones 4.18 Environmental Management and Conservation Zone Code PO6 And Part 9 Other Plans/ 9.2 Palmview Structure Plan PO6	<b>Issue:</b> The update is required to comply with the <i>Environmental Offsets Act 2014</i> , however, it is understood this master planned area is a legacy issue and may not be able to be amended to current terminology. <b>Action:</b> Replace “adverse impacts” with “significant residual impacts” Insert mitigate and offset where appropriate
71	DESI	SPP Biodiversity Policy 3  <i>Environmental Offsets Act 2014: Section 8 (What is a significant residual impact)</i>	Part 4 Zones codes Other zones 4.20 Emerging Community Zone Code PO3	<b>Issue:</b> Updates to Part 4: Zone codes and other zones are required to comply with the <i>Environmental Offsets Act 2014</i> . As mentioned above. <b>Action:</b> Replace (b) with: i. development avoids significant residual impacts; and ii. minimises and mitigates significant residual impacts where avoidance is not possible; iii. does not result in a significant residual impact unless the significant residual impact is acceptable, and an offset is provided (where appropriate)
72	DESI	Water Quality State Interest Policy 5	6.5.3 Assessment benchmarks for assessable development  Table 6.5E Assessment benchmarks for assessable development AS14	<b>Issue:</b> Policy 5 of the Water Quality state interest requires that the scheme meets the pollutant reductions and release limits as per the SPP. <b>Action:</b> Include achievement of the stormwater management design objectives from the SPP water quality state interest.
73	DESI	Water Quality State Interest	Planning Scheme Policy for Development Works (not supplied)	<b>Issue:</b> To better achieve the water quality state interest in protecting and enhancing the environmental values and water quality of Queensland waters and reflect best practice. <b>Advice:</b> If not already included in the Development Works PSP, council should consider including an Erosion and Sediment Control (ESC) hazard assessment as part of the ESC Plan requirement:



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<ul style="list-style-type: none"> <li>Split developments into low, medium and high risk ESC.</li> <li>ESC Plans for low and medium risk developments should be undertaken and approved by a Certified Professional in Erosion and Sediment Control (CPESC) in place of a Registered Professional Engineer of Queensland (RPEQ)</li> <li>ESC Plans for high risk developments should be undertaken and approved by both a CPESC and RPEQ that is experienced in ESC.</li> </ul>
74	DESI	Water Quality State Interest	Planning Scheme Policy for Development Works (not supplied)	<p><b>Issue:</b></p> <p>Retain the water quality design objectives in the drafting of the updated PSP for Development works to comply with the water quality state interest and ensure the stormwater management design objectives are met.</p> <p><b>Advice:</b></p> <p>The construction phase and post construction phase stormwater management design objectives of the SPP water quality state interest are currently met by SCC's existing PSP for Development works. Council must ensure that these requirements continue to be met in the PSP for Development works in the new planning scheme. Council may consider imposing stricter stormwater management requirements than those in the SPP if desired.</p>
75	DESI	Water Quality State Interest	Planning Scheme Policy for Development Works (not supplied)	<p><b>Issue:</b></p> <p>To assist council and industry with urban stormwater management and reflect best practice.</p> <p><b>Advice:</b></p> <p>Council may consider including the following recently released Water by Design – Healthy Land and Water guidelines:</p> <ul style="list-style-type: none"> <li>improving the biology of bioretention systems</li> <li>specifications for bioretention filter media</li> <li>guidelines for the construction and establishment of bioretention systems and wetlands.</li> </ul>
76	DESI	SPP – Natural hazards, risk and resilience	Erosion Prone Area mapping generally	<p><b>Issue:</b></p> <p>The council advised the department on 13 February the update of the Erosion Prone Area (EPA) mapping for the Sunshine Coast local government area has been finalised by DESI.</p> <p><b>Action:</b></p> <p>Update the planning scheme as required to reflect the agreed EPA.</p> <p><b>Advice:</b></p> <p>The erosion prone area is made up of 3 components. Only 2 components are included in the coastal hazards overlay, namely 'Open Coast Erosion to 2100 Area' and 'Permanent Tidal Inundation Area (Highest Astronomical Tide at 2100)'. These are the calculated erosion distance and sea level rise components, respectively. The overlay does not include the third component, being the default mapping of 40m + HAT. It is noted the current State erosion prone area layer is included for 'information only' and the PS has not referenced the default component, which applies to riverine areas.</p>
77	DESI	SPP – Natural hazards, risk and resilience	Planning Scheme Schedule 1 Definitions SC1.2 Administrative definitions	<p><b>Issue:</b></p> <p>Coastal hazard area is defined by Council as only including only 2 of the 3 components of the erosion prone area, specifically excluding the default 40m+HAT buffer layer. Given that, under the <i>Coastal Protection and Management Act 1995</i>, the definition for 'coastal hazard' includes erosion of the foreshore, which includes tidal waterways, the proposed definition is insufficient.</p> <p>As an example, PO1 of the Coastal Hazards Overlay Code relates to avoiding development in coastal hazard areas. Consequently, development on land adjacent to rivers that may be at risk from erosion, other than erosion due to sea-level rise, is not picked up by this PO.</p> <p><b>Action:</b></p> <p>Amend the definition of Coastal Hazard Area to include the 40m+HAT buffer layer.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
78	DESI	SPP – Cultural heritage policy no.4	Heritage and Character Areas Overlay map	 <p><b>Issue:</b></p> <p>The locally significant tree identified in William Landsborough Park (Golden Beach) appears to be partly mapped in the Heritage Place category and the Land in Proximity to a Local Heritage Place. This would mean development involving ‘building work’ to prune or alter the outer extremities of the tree’s canopy and/or root system would not be triggered for assessment against the Heritage and Character Areas Overlay code.</p> <p>In addition, the tree planted as a memorial to William Landsborough at Worthington lane, Golden Beach, has not been accurately mapped to include the entire physical extent of the canopy within the Local heritage place area boundary.</p> <p>The <i>Queensland Heritage Act 1992</i> defines a local heritage place as “<b>a place</b> that is of cultural heritage significance for a local government area, and is identified as a <b>place</b> of cultural heritage significance in the local government’s planning scheme or...”</p> <p>The Act further defines a ‘<b>place</b>’ as:</p> <p>“1. a defined or readily available area of land, whether or not held under 2 or more titles or owners.</p> <p>2. includes (a) any feature on land mentioned in item 1 above, and (b) any part of the immediate surrounds of a feature mentioned in paragraph (a) that may be required for its conservation.”</p> <p>Given the <i>Queensland Heritage Acts 1992</i> definition of a place and the physical circumstances of the subject tree, it would be more appropriate for the full, physical extent of the tree to be mapped in the local heritage place boundary. Partly mapping the canopy and root system (ie. tree protection zone) in the land adjoining category without triggering assessment of building work may result in development which harms the tree and its eventual demise.</p> <p><b>Action:</b></p> <p>Amend the overlay mapping for the subject trees by including their physical extent within the Local heritage place category of the overlay to ensure all physical fabric pertaining to local heritage places is accurately represented in the Heritage and Character Areas Overlay map.</p>
79	DESI	SPP – Cultural heritage policy no.4	Heritage and Character Areas Overlay Code	<p><b>Issue:</b></p> <p>The term ‘significance’ as it pertains to a local heritage place, is expressed in different ways in both the purpose of the code and performance outcomes, and yet it appears to represent the same thing. For example the purpose statement at 6.11.1(b) refers to the “identified significance” of the local heritage place whereas the purpose statement at 6.11.1(e) seeks development that is “compatible with the heritage significance of the place.”</p> <p>The <i>Queensland Heritage Act 1992</i> provides a definition for ‘cultural heritage significance’ and it refers to the same cultural heritage criteria used to identify the SCC’s culturally significant local heritage places (ie. aesthetic, historical, scientific, social etc.).</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<p>For consistency and clarity, it is recommended that the term “cultural heritage significance” is used in place of abbreviated or shortened versions of similar terms used to ascribe value to a local heritage place.</p> <p><b>Action:</b></p> <p>To ensure terminology used in the overlay code is consistent with defined terms in supporting legislation and avoids ambiguity - replace expressed terms such as “identified significance” and “heritage significance” with the phrase “cultural heritage significance” in the purpose statements and performance outcomes.</p>
80	DESI	SPP Emissions and Hazardous Activities Policy 4	Part 7 – use codes	<p><b>Issue:</b></p> <p>The outcome stated in Part 2.5 Healthy and Resilient Environment, SO11.8 of the Strategic Framework, needs to be reflected in the subsequent codes that meet the definition of sensitive land uses.</p> <p><b>Action:</b></p> <p>Ensure all codes that refer to sensitive land uses, provide provisions that protect sensitive land uses from the impacts of previous activities on the land (e.g., contaminated land).</p>
Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships				
81	DTATSIPCA	SPP - Planning for the environment and heritage – Cultural Heritage		<p><b>Issue:</b></p> <p>The requirement for developers to engage with the Aboriginal Party and potentially undertake a Cultural Heritage Report for lots over a certain size, is supported. However, there are many highly significant Aboriginal cultural heritage sites (e.g. Bora Rings) on lots less than the identified size and any development applications over these lots will not require Aboriginal Party engagement.</p> <p><b>Action:</b></p> <p>Consider reviewing the assessment provisions for smaller sites to engage with the Aboriginal Party and undertake a Cultural Heritage Report.</p>
82	DTATSIPCA	SPP - Planning for the environment and heritage – Cultural Heritage		<p><b>Issue:</b></p> <p>It is noted in the assessment Benchmarks for Biodiversity, Waterways, Wetlands Overlay Code, Heritage and Character Areas Overlay Code, Nature and Rural Based Tourism Code, Reconfiguration of a Lot Code and Vegetation Management Code that ‘known First Nations cultural heritage features are identified on the Aboriginal and Torres Strait Islander Cultural Heritage Database and Register’ and that ‘applicants are required to check the register to determine whether known cultural heritage features exist on the development site’.</p> <p><b>Action:</b></p> <p>It is recommended that the proponents check both the database and the register, as the register only includes those sites which have been included in Part 6 Studies and any Designated Landscape Areas. The current recommended process would not capture the identification of the 860 Aboriginal cultural heritage sites located on the DTATSIPCA Cultural Heritage Database.</p>
83	DTATSIPCA	SPP - Planning for the environment and heritage – Cultural Heritage	Terminology - All of Scheme	<p><b>Action:</b></p> <p>It is recommended that you include the wording ‘Aboriginal Party’ instead of ‘First Nation Body’ regarding who to engage with for development applications, as this is in line with the wording of the <i>Aboriginal Cultural Heritage Act 2003</i>.</p>
84	DTATSIPCA	SPP - Planning for the environment and heritage – Cultural Heritage		<p><b>Advice:</b></p> <p>The requirement to check the DTATSIPCA cultural heritage database as part of development applications is supported, however it should come with a disclaimer that the database can be inaccurate as it has not been ground-truthed and is an accurate reflection of all Aboriginal Cultural Heritage sites in the area. This database is updated regularly so it is recommended to have a validity clause where development applications will have to search the database every 12 months.</p>
85	DTATSIPCA	SPP - Planning for the environment and heritage –		<p><b>Advice:</b></p> <p>A formal agreement such as an Intellectual Property Rights, Shared Benefit Agreement and/or whole of Country Memorandum of Understanding would be advantageous for council to explore with the Traditional Owners. This could assist with the development of an Aboriginal Cultural Heritage Site mapping layer to sit in the planning scheme, as a trigger for development.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		Cultural Heritage		
Department of Agriculture and Fisheries				
86	DAF	SPP – Planning for economic growth – Agriculture	Strategic Framework  A smart and prosperous economy  Element 9 - Rural enterprise and agricultural land  SO9.3	<p><b>Issue:</b></p> <p>Agricultural uses that are not directly dependant on ALC Class A or B land, such as aquaculture and intensive animal industries, are allowable on ALC Class A/B land, where impacts to this land are minimised, and soil resources managed to allow for rehabilitation of the land to a stable condition.</p> <p>DAF acknowledges that it not possible to properly offset the loss of ALC Class A/B land as this resource can't be created. DAF is trying to achieve a situation where there is some sort of counterbalance to the continued unmitigated loss of both ALC Class A/B land and agriculture and this may be through securing an equal amount of ALC Class A/B land elsewhere and using appropriate mechanisms to lock the land up for agricultural purposes, or, alternatively, contributing to the increase in productivity on other sites through provision of more land / infrastructure.</p> <p>DAF would be happy to work with Council to achieve a workable outcome in this regard.</p> <p><b>Action:</b></p> <p>Include another dot point for SO9.3 and further wording on Part (c) so it reads:</p> <ul style="list-style-type: none"> <li>a) an overriding community need in the public interest had been demonstrated that warrants approval of the development despite its location on ALC Class A and Class B land; and</li> <li>b) <u>development is an agricultural use that is not directly dependant on ALC Class A or B land such as aquaculture, intensive animal industries or intensive horticulture; and</u></li> <li>c) <u>impacts on ALC Class A and Class B are mitigated as far as possible, so that there is no net loss of agricultural values (resources and infrastructure critical for agriculture and agricultural productivity).</u></li> </ul>
87	DAF	SPP – Planning for economic growth – Agriculture	Tables of Assessment  Table 3.2.12A - Material change of use - Low Impact Industry Zone  Table 3.2.13A - Material change of use - Industry Zone  Table 3.2.22A - Material change of use - Rural Zone  Rural Activities	<p><b>Issue:</b></p> <p>Certain types of aquaculture developments do not require a development permit under the <i>Planning Act 2016</i> and are accepted development. These types of low impact aquaculture operations could be encouraged by using low assessment levels in the draft planning scheme.</p> <p>Under the accepted development requirements for aquaculture, aquaculture development may be undertaken, providing the development does not discharge waste into off-site waters, and the species farmed are any of the following:</p> <ul style="list-style-type: none"> <li>• indigenous freshwater fish cultured within the catchment or river basin to which the fish is indigenous and held in ponds or above-ground tanks with a total water surface area of no more than 10ha</li> <li>• indigenous freshwater fish where the species is not indigenous to the particular catchment where the aquaculture occurs and held in rain-proofed, above-ground tanks with a total area of no more than 100m2 (excluding water storage areas that are free of stock).</li> <li>• non-indigenous fish, kept in rain-proofed, above-ground tanks with a total area of no more than 100m2 (excluding water storage areas that are free of stock)</li> <li>• native marine fish, kept in rain-proofed, above-ground tanks with a total area of no more than 100m2 (excluding water storage areas that are free of stock).</li> </ul> <p>These requirements could be used to define what “low impact aquaculture” is and this would assist meeting SPP Agriculture Policy 4 (a).</p> <p>For more information, please refer to: <a href="https://www.business.qld.gov.au/industries/farms-fishing-forestry/fisheries/aquaculture/policies-licences-fees/licensing-approvals/accepted-development-requirements">https://www.business.qld.gov.au/industries/farms-fishing-forestry/fisheries/aquaculture/policies-licences-fees/licensing-approvals/accepted-development-requirements</a></p> <p><b>Action:</b></p> <p>Consider introducing an administrative definition for low-impact aquaculture that could be made code assessable in the Low Impact Industry Zone and the Industry Zone</p>
88	DAF	SPP – Planning for economic growth – Agriculture	Tables of Assessment  Table 3.2.22A - Material change of use - Rural Zone  Intensive animal industry	<p><b>Issue:</b></p> <p>Whilst DAF notes and is encouraged that certain scales of intensive animal industries have been included as code assessable, the threshold numbers are too low (excluding poultry) to promote the industry.</p> <p>The SPP supports the promotion of hard to locate intensive rural uses and with regards to intensive animal industry (SPP Agriculture, Policy 4(a)), DAFs position is that non-ERA activities (below 150 SCUs, 1000 SSU and 400 SPU) are Code Assessable, whereas thresholds that require an ERA are impact assessable.</p> <p><b>Action:</b></p> <p>Increase threshold for numbers of standard cattle units (SCU) in a feedlot for Code assessment to 150, sheep to 1000 standard sheep units (SSUs) and pigs to 400 standard pig units (SPUs).</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
89	DAF	SPP – Planning for economic growth – Agriculture	Tables of Assessment Table 3.2.22A - Material change of use - Rural Zone  Permanent Plantation	<p><b>Issue:</b> A permanent plantation is an irreversible land use which has the potential to impact agricultural productivity. DAF would not support a situation where land producing food, fibre or medicine was converted to a permanent plantation, including for environmental offsetting purposes. Such an outcome would not comply with the SPP Agriculture.</p> <p><b>Action:</b> Change “permanent plantation” from accepted development to accepted with requirements – the requirements being that a permanent plantation is not located on:</p> <ul style="list-style-type: none"> <li>• ALC Class A or B land</li> <li>• land within an Important Agricultural Area</li> </ul>
90	DAF	Forestry Act 1959	Zones	<p><b>Issue:</b> State Forests have been specifically gazetted as a tenure for the production of forestry products (including timber and quarry materials) in perpetuity. State forest tenures incorrectly zoned as conservation area, have been known to be incorrectly utilised as an offset for other development activities, which impacts timber and extractive industries (quarrying). While there are exemptions for timber harvesting in planning legislation, the same does not exist for quarrying. Local governments are unable to regulate activities on state forest through a local planning scheme, however, quarrying can be negatively impacted through the material change of use process.</p> <p>A further email was provided to council (dated 17 April 2024) from DAF (via DHLGPPW) containing additional lot and plan details of State Forest tenure within the Sunshine Coast Regional Council area that are requested to be rezoned as rural within the proposed planning scheme.</p> <p><b>Action:</b> That State Forest areas are removed from the “environment management and conservation zone” and more appropriately zoned as “rural zone”.</p>
91	DAF	SPP – Planning for economic growth - Agriculture	Strategic Framework  Shaping sustainable growth  Element 6 - Green frame  SO6.8	<p><b>Issue:</b> Strategic Outcome 6.8 articulates that ‘Compatible value-adding rural enterprises’ may be located in rural areas. DAF suggests that this SO is reworded to be very clear that rural/agri tourism is supported in rural areas. This would align with the SPP Agriculture, Policy 4 (d).  Agri-tourism is a developing sector which can provide real benefits for producers and the community. The sector is estimated to be worth \$5.6 billion by 2030 (Growth opportunities for Australian Food and Agribusiness. CSIRO 2019).</p> <p><b>Action:</b> Reword SO6.8 to:  “Rural areas continue to provide opportunities for rural production activities, and maintain landscape, cultural heritage and biodiversity values. Compatible value-adding rural enterprises <b>(including rural/agri tourism)</b> may also be located....”</p>
92	DAF	SPP – Planning for economic growth – Agriculture	Rural Zone Code  Table 4.24B Consistent uses and potentially consistent uses in the Rural Zone  Rural activities  Part (d)	<p><b>Issue:</b> The threshold numbers are too low (excluding poultry) to promote the industry. The SPP supports the promotion of hard to locate intensive rural uses and with regards to intensive animal industry (SPP Agriculture, Policy 4(a)), DAFs position is that non-ERA activities (below 150 SCUs, 1000 SSU and 400 SPU) are Code Assessable, whereas thresholds that require an ERA are impact assessable.</p> <p><b>Action:</b> Change Part (d) so that the thresholds for intensive animal industries are increased in the consistent uses column:  (d) intensive animal industry (where involving less than 400 standard units of pigs, 1,000 birds or poultry, 150 standard units of cattle or 1000 standard units of sheep)</p>
93	DAF	SPP – Planning for economic growth - Agriculture	Rural Activities Code  Table 7.19D Siting and setback requirements for intensive rural uses  Intensive horticulture  Page 156/179	<p><b>Issue:</b> Small scale intensive horticulture operations can be viable on as little as 1 hectare, however DAF acknowledges that such a scale is unlikely to be viable in the Sunshine Coast local government area. However, 10 hectares is too large to provide support to the industry. Three hectares might be enough to meet the required setbacks, provide enough production area to be viable and support the growing intensive horticulture industry, particularly small scale operations. This would align with SPP Agriculture, Policy 4(a).</p> <p><b>Action:</b> Change the Minimum site area for intensive horticulture from 10 hectares to 3 hectares.</p>
94	DAF	Biosecurity Act 2014	State Interest Review Report	<p><b>Issue:</b> References to biodiversity don’t cover biosecurity issues, in particular, the pests and diseases that can reduce biodiversity. Biosecurity should be included as an additional element.</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			Part 2 Strategic framework 2.5 A healthy and resilient environment	<p><b>Advice:</b></p> <p>Include Additional Element - Mitigating Pests (Biosecurity)</p> <p>Development is undertaken in in a way that manages increasing biosecurity risk and recognises a one health interaction between human health, plant health and animal health.</p> <p>Development is conducted in a way that complies with the general biosecurity obligation outlined under the <i>Biosecurity Act 2014</i>.</p> <p>High risk biosecurity sites (such as waste management facilities, areas cleared of native vegetation areas undergoing development) are planned for in a way that takes into account biosecurity outcomes and the high risk of the spread of pests and diseases.</p> <p>Note: Biosecurity is the management of risks to the economy, the environment, and the community, of pests and diseases entering, emerging, establishing or spreading.</p>
95	DAF	<i>Planning Act 2016 Fisheries Act 1994</i>	Part 2 Strategic framework 2.7 A smart and prosperous economy Element 10 Natural economic resources SO10.1	<p><b>Issue:</b></p> <p><i>Waterways providing for fish passage</i> and <i>marine plants</i> are an MSES. Effective protection and management of marine plants and waterways will assist in sustaining Queensland's fish stocks for recreational, commercial and traditional fisheries.</p> <p><b>Action:</b></p> <p>Add wording:</p> <p>SO10.1 Natural economic resources, including the following, are protected from incompatible land uses and remain available for productive use:</p> <ul style="list-style-type: none"> <li>a) key resource areas (KRAs), local resource areas and their associated haulage and transport routes;</li> <li>b) State forests and approved private native forests and plantations; and</li> <li>c) fisheries resources, including marine, estuarine and freshwater fish habitats, declared fish habitat areas, <b>marine plants and waterways providing for fish passage.</b></li> </ul>
96	DAF	<i>Planning Act 2016</i>	Part 8 Other development codes 8.7 Stormwater Management Code	<p><b>Issue:</b></p> <p>Stormwater management systems have the potential to impact on aquatic habitat and/or restrict the free movement of fish throughout Queensland waterways.</p> <p>Storm water treatment systems such as detention basins, water sensitive urban design structures, gross pollutant traps or water treatment facilities should be considered and located outside of waterways. Stormwater run-off treatment systems should be located outside of waterways that provide for fish passage to avoid impacts to fish habitat. To ensure that stormwater management and treatment systems minimise adverse impacts on waterways, water quality and aquatic habitat including fish passage in receiving waters. Early consideration of this issue will help to avoid impacts on fish habitat and reduce complexity when making any applications under the <i>Planning Act 2016</i>.</p> <p>To ensure that stormwater run-off is treated prior to entering waterways that provide for fish passage. Treating the water quality outside of the waterway will protect the aquatic ecosystem values and fish habitat.</p> <p><b>Action:</b></p> <p>Add Acceptable Outcomes:</p> <ul style="list-style-type: none"> <li>• PO13 - AS13.3: Stormwater infrastructure is designed to allow adequate fish passage and natural establishment of fish habitat features.</li> <li>• PO15 - AS15.1: Stormwater run-off is to be treated and carried to stable waterways; stormwater treatment systems are located outside of waterways and detain diverted stormwater.</li> </ul>
97	DAF	<i>Forestry Act 1959</i>	Extractive Industry Overlay	<p><b>Issue:</b></p> <p>The mapping needs to accurately depict any existing quarries to avoid confusion and contest.</p> <p><b>Action:</b></p> <p>The extractive overlay recognises "existing quarries" within a KRA and other Local Resource Areas (Mapped as blue) over state land. However, the mapping does not always correlate and should be amended to accurately depict any existing quarries.</p>
98	DAF	<i>Forestry Act 1959</i>	6.8 Extractive Industry Overlay	<p><b>Issue:</b></p> <p>Some sensitive receptors may be impacted regardless of whether or not the extractive industry operates within the separation area. The intent should be to not impact receptors outside of the separation area.</p> <p><b>Action:</b></p> <p>Amend the extractive industry overlay code at section 6.8, to remove "either within or":</p> <p>PO4 – (AS4.1) - Where extractive industry development occurs within an extractive resource separation area, the extractive industry does not impact on sensitive receptors located <del>either within or</del> outside of the extractive resource separation area.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
Department of Housing, Local Government, Planning and Public Works (Housing Directorate)				
99	Housing	<i>Housing supply and diversity Policies 2, 3 (b) (c)</i> <i>Liveable communities 2 (d)</i> <i>Shaping SEQ - Outcome 4 Social and Affordable Housing</i>	Strategic framework, element 1 – Managing growth	<b>Issue:</b> The State seeks Council's support for the delivery of social and affordable housing in strategic frameworks to achieve the delivery of 20% new homes being social and affordable housing, as envisioned by ShapingSEQ 2023. The strategic framework refers to affordable living but does not specifically provide support for social and affordable housing. <b>Action:</b> Amend the strategic framework to include a clause stating that social and affordable housing outcomes are supported.
100	Housing	<i>Housing Supply and Diversity Policy 1, 2, 3 (a) (b) (c)</i> <i>Liveable communities 1(a), 2(b)</i> <i>Economic Development (development and construction) 4</i>	Part 11 Development in the low residential zone – local plan precinct CAL LPP-3 Dicky Beach/Moffatt Beach/Shelly Beach PO64	<b>Issue:</b> Reconfiguring a lot in the Low-Density Residential Zone in Local Plan Precinct CAL LPP-3 Dicky Beach/Moffatt Beach/Shelly Beach maintains the preferred low density residential character and characterised by larger suburban lots (approx. 700m2). This is unlikely to assist in the provision of affordable housing. If street character is key, infill development such as dual occupancy or rear lots should be facilitated to encourage diversity of housing including smaller forms. <b>Action:</b> Remove the restrictive provisions for the Dicky Beach/Moffatt Beach/Shelly Beach locality. This locality should be no different to the other LDR zoned land. There is no justification for this protected housing area.
101	Housing	<i>Housing Supply and Diversity Policy 2, 3 (a) (b) (c), 4</i> <i>Liveable communities 1 (a), 2(b) (e)</i>	Part 7 Use codes, 7.7 Dual occupancy code PO5, AS5.2 site cover proposed at 50% where in a zone that is not Low density residential	<b>Issue:</b> The site coverage does not encourage efficiency in development of sites as required by the housing supply and diversity SPP. It is noted that the QDC refers to 50%, however it is recommended that in zones such as LMDR expected to accommodate dual occupancy and small scale multiple dwellings, that site cover be increased. <b>Action:</b> Review site cover to better reflect the intent of the zones such as low medium density residential - suggest AS for site cover be increased.
102	Housing	<i>Housing Supply and Diversity Policy 2, 3 (a) (b) (c), 4</i> <i>Liveable communities 1 (a), 2(b) (e)</i>	Part 7 Use codes 7.7 Dual occupancy code PO12, AS12.1 private open space is a minimum of 50m2 and AS12.2 balconies 16m2. And Part 7 Use codes 7.14 multi-unit residential code PO15, AS125.1 private open space is a minimum of 25m2 and AS15.2 balconies 16m2.	<b>Issue:</b> Private open space where applicable is proposed as a minimum of 50m2 exclusive of clothes drying and other areas such as landscaping. This is quite large for affordable dwellings and affect affordability. Balconies are proposed at 16m2 also large - affecting affordability. This should be revised down and provision amended to reflect useability and graduated rates for size of unit (e.g. based on bedrooms etc). Private open space for ground floor dwelling is proposed as a minimum of 25m2 exclusive of clothes drying and other areas such as landscaping. This is quite large for affordable dwellings and affect affordability. Balconies are proposed at 16m2 which are relatively large which will impact on affordability. Suggest this should be revised down and provision could be amended to reflect useability and graduate rates based on size of unit (e.g. based on bedrooms etc). <b>Action:</b> To facilitate the delivery of more affordable forms of housing, reduce minimum size for private open space and balconies, and introduce flexible provisions.

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
103	Housing and DHLGPPW	<i>Housing Supply and Diversity page 23 (avoid regulatory inefficiencies and barriers to implementatio n) and Policies 2, 3 (b) (c)  Liveable communities 1 (a), 2(b)</i>	Part 7 Use codes,  7.8 Dwelling house code, Table 7.8A requirements for accepted development, Part 6 secondary dwellings R6.1; 7.8.3 Assessment benchmarks for assessable development, Table 7.8B, Part 6 secondary dwellings.  Part 7 Use codes, 7.9 Dwelling house (small lot) code, Part 8 secondary dwellings – Planning rationale, PO 16	<b>Issue:</b>  The Planning Regulation 2017, Schedule 6, was amended to state that dwelling houses in residential zones (other than MDR and HDR) could not be made assessable unless a “relevant overlay” applies. Secondary dwellings fall under the administrative definitions of the Planning Regulation not under the use definitions. Secondary dwellings are part of a dwelling house as defined in the Planning Regulation.  <b>Action:</b>  Review the assessment provisions for secondary dwellings to ensure consistency with the Planning Regulation, Schedule 6 and remove provisions that seek to regulate secondary dwellings separate to dwelling houses.
104	Housing	<i>Housing Supply and Diversity page 23 (avoid regulatory inefficiencies and barriers to implementatio n) and Policies 2, 3 (b) (c)  Liveable communities 1 (a), 2(b)</i>	Part 7, 7.14 Multi-unit residential uses code 7.14.2 Assessment benchmark for assessable development PO7, AS7 site cover	<b>Issue:</b>  AS7 relating to site cover is inconsistent with the SPP for housing supply and diversity. AS7 states site cover of 50% or less for multiple units. This does not adequately reflect the development form sought for zones and is likely to adversely affect urban form and affordability of units (e.g. low dwelling yields).  <b>Action:</b>  Review site cover for multiple units acceptable solution (less than 50%) and increase to reflect the zone more appropriately.
105	Housing	<i>Housing Supply and Diversity Policy 3 (b)</i>	Strategic framework element 2 – Urban Living S02.1	<b>Issue:</b>  “A wide range” of housing should be replaced by terminology consistent with the SPP and reference a “diversity of housing”.  <b>Action:</b>  Amend paragraph in the strategic framework to refer to diversity of housing.
106	Housing	<i>Housing Supply and Diversity Policies 1, 3 (b)  Liveable communities 1 (a), 2(b)</i>	4.3 Low medium density residential zone code 4.3.2 Assessment benchmarks for assessable development. Table 4.3A PO6	<b>Issue:</b>  PO6 states “Development in the Low-Medium Density Residential Zone provides for the height of all buildings and structures to be low rise”. PO6 refers to 2 – 3 storeys which is presumable “low rise”. Further clarity is required on the term ‘low-rise’ and explanation on how this outcome will deliver the residential typologies expected of a LMDR zone.  <b>Action:</b>  Further explain ‘low rise’, ‘medium rise’ and ‘high rise’– note these are not administrative definitions.
107	Housing	<i>Housing Supply and Diversity Policy page 23 (planning</i>	4.4 Medium density residential zone code 4.4.2 Assessment benchmarks for assessable	<b>Issue:</b>  PO8 of table 4.4A and the height overlay code (6.10) define height by both floors and metres, this should be simplified to reduce levels of regulation, introduce flexibility to ensure a range of dwelling typologies are delivered.

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		<i>instruments to incorporate flexible planning arrangement and avoid inefficiencies)</i>	development. Table 4.4A PO8  Part 6 Overlay Codes 6.10 Height overlay code	<b>Action:</b> <ul style="list-style-type: none"> <li>Review PO8 of table 4.4A and the height overlay code so that height refers to only metres or storeys.</li> <li>Introduce flexibility to ensure a range of dwelling typologies are delivered.</li> <li>Remove provisions that use different ground level determinations for land use in the same zone.</li> </ul>
108	Housing	<i>Housing Supply and Diversity Policy 1, 2, 3 (a) (b)</i>  <i>Liveable communities 1 (a), 2(b) (d) (e)</i>  <i>Economic Development (development and construction) 4</i>	Part 8 – Other development codes, 8.5 reconfiguring a lot and Map MLS1 (minimum lot size map)	<b>Issue:</b> Minimum lot sizes are not provided in the RAL code, but it is noted these are reflected in map form in Map MLS1. These have been difficult to assess. The range of lot sizes per zone is needed to ascertain the impact of this map and certain scheme provisions, particularly in the low-density zone.  <b>Action:</b> Recommend the range of minimum lot sizes per zone be provided.
Building Codes Queensland				
109	DHLGPPW (Building Codes Queensland)	<i>Planning Act 2016 Section 8(5)</i>  <i>Building Act 1975 Section 31(4)</i>  <i>Building Act 1975 Section 33(3)</i>	Part 7 Use codes	<b>Issue – POs for siting requirements alternate to QDC MP 1.2:</b> Performance outcomes address siting requirements for building work and operate as alternative provisions to QDC MP 1.2. An example is 7.3 Caretaker's accommodation code, PO3 (a), 7.5, PO5 (e).  The performance outcomes do not always stipulate that they are alternative provisions to the QDC, they are not closely aligned to QDC MP 1.2, and acceptable solutions are not always provided. This creates a lack of clarity for users.  <i>Refer:</i> <ul style="list-style-type: none"> <li><i>Planning Act 2016 Section 8(5) - A local planning instrument must not include a provision about building work, to the extent the building work is regulated under the building assessment provisions, unless allowed under the Building Act 1975.</i></li> <li><i>Building Act 1975 Section 31(4) A local law, local planning instrument or local government resolution must not include provisions about building work, to the extent a building assessment provision mentioned in subsection (3) applies to the building work.</i></li> <li><i>Building Act 1975 Section 33(3) - However, a planning scheme or PDA instrument may include alternative provisions only if the provisions are a qualitative statement or quantifiable standard.</i></li> </ul> <b>Action:</b> The following is recommended where siting requirements operate as alternative provisions to QDC MP 1.2 <ul style="list-style-type: none"> <li>Provide an acceptable solution to satisfy section 33(3) of the <i>Building Act 1975</i></li> <li>Insert notes which clarify for users that they are alternative provisions to QDC MP 1.2.</li> <li>Ensure siting requirements for adjoining lots aligns with QDC MP 1.2</li> <li>Consider more closely aligning the performance outcomes with QDC MP 1.2.</li> </ul>
110	DHLGPPW (Building Codes Queensland)	<i>Planning Act 2016 Section 8(5)</i>  <i>Building Act 1975</i>	Part 7 Use codes	<b>Issue – Acoustic barrier requirements:</b> Requirements for installing acoustic barriers do not identify the required sound rating. Examples include: <ul style="list-style-type: none"> <li>7.4 Childcare centre code, AS 10.2</li> <li>7.5 Community activity code, AS 9.2</li> <li>7.14 Multi-unit residential code, PO14 (d)</li> </ul> <b>Action:</b> Specify the level of sound attenuation (dBA) that must be achieved by acoustic screens required by any relevant performance outcomes or acceptable solutions.

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
111	DHLGPPW (Building Codes Queensland)	<i>Building Regulation 2021</i>	6.6 Bushfire Hazard Overlay Code  6.9 Flood Hazard Overlay Code  7.8 Dwelling House Code – 7.8.2 Requirements for accepted development	<p><b>Issue:</b></p> <p>References to the Building Regulation should be updated from Building Regulation 2006 to Building Regulation 2021.</p> <p><b>Action:</b></p> <p>Update Building Regulation 2006 to Building Regulation 2021 where applicable including:</p> <ul style="list-style-type: none"> <li>• 6.6 Bushfire Hazard Overlay Code</li> <li>• 6.9 Flood Hazard Overlay Code</li> <li>• 7.8 Dwelling House Code – 7.8.2 Requirements for accepted development</li> </ul>
112	DHLGPPW (Building Codes Queensland)	<i>Queensland development code MP 4.2</i>	Part 1.4 Building work under the planning scheme  Part 7 Use codes  Part 8 – Other development codes	<p><b>Issue – Water tank requirements:</b></p> <p>The draft planning scheme references the requirements of Queensland development code mandatory part 4.3 (Rainwater tanks and other supplementary water supply systems). A local government must apply to the Minister to-opt in to QDC MP 4.2. It seems that Sunshine Coast has not yet been approved to opt-in to QDC MP 4.2.</p> <p><b>Action:</b></p> <p>Ensure ministerial approval is achieved prior to commencement of the planning scheme. For more information about opt-in requirements, please refer to the <a href="#">Water supply systems   Business Queensland</a> webpage.</p>
113	DHLGPPW (Building Codes Queensland)	<i>Planning Act 2016 Section 8(5)</i>  <i>National construction code</i>	Part 7 Use codes  7.16 Relocatable Home Park and Tourist Park Code, AS 16.1-16.4  7.17 Residential Care Facility and Retirement Facility Code AS 10.1-10.4  7.18.4 Assessment benchmarks for assessable development being rooming accommodation other than small- scale rooming accommodation, PO2 & PO3	<p><b>Issue:</b></p> <p>Accessibility requirements in accepted solutions do not align with the assessment provisions in the national construction code (NCC).</p> <p><b>Action:</b></p> <p>Review AS16.1-4 against AS1428 and the NCC to ensure compliance and alignment. Building assessment provisions relating to access and facilities for people with disabilities for class 1 and class 2 to 9 buildings are contained in the NCC.</p> <p>Review 7.18.4 against the requirements of the NCC as the current performance outcomes and acceptable solutions are building work. Access is based on the class of a structure</p>
114	DHLGPPW (Building Codes Queensland)	<i>Planning Act 2016 Section 8(5)</i>  <i>Planning Regulation 2017</i>	Definitions	<p><b>Advice:</b></p> <p>Battery storage facilities and devices have recently been defined in the Planning Regulation 2017, it would be optimal to provide examples of what is and is not included. Reference can be guided by the information presented in the Planning Amendment Regulation 2022 responsible for the introduction of battery storage facilities.</p>
115	DHLGPPW (Building Codes Queensland)	<i>Planning Act 2016 Section 8(5)</i>  <i>Building Act 1975</i>	Part 7 Use codes – 7.6 Community Residence Code, AS 1.3	<p><b>Advice – Parking requirements for a community residence:</b></p> <p>It is recommended to:</p> <ul style="list-style-type: none"> <li>• review AS1.3 against the requirements under the NCC. The NCC addresses carparking requirements for people with a disability for class 2-9 buildings and the new liveable housing design requirements under the NCC address carparking requirements for class 1 buildings.</li> <li>• insert a note to include consideration of relevant car parking requirements under the <i>Building Act 1975</i>.</li> </ul>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
SEQ Water				
116	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 2 Strategic Framework – Section 2.4 Shaping Sustainable growth – 2.4.2 Strategic outcomes Element 5	<p><b>Issue:</b></p> <p>Growth management boundaries – There will be some further development and expansion in the hinterland/hinterland towns that are within our source catchments (e.g. Maleny, Mapleton, Kenilworth, Conondale, Peachester). The State supports the planning scheme's management of growth boundaries particularly where it enables protection of water catchments which in turn protects water quality aspects of bulk water supply, however wastewater generated in source water catchments poses a key risk to drinking water safety.</p> <p><b>Action:</b></p> <p>To reduce risk to the safety of drinking water, any further urban or residential development within source water catchments (esp. in Maleny, Mapleton and Kenilworth) should be serviced via reticulated sewer network. Where this is not possible, land/block size must be subdivided in a manner able to properly accommodate onsite wastewater facilities that will meet Seqwater Development Guidelines. Further, development in these areas, in both the construction phase and ongoing, needs to be undertaken ensuring risks to water quality posed by sediment pollution and eutrophication are mitigated.</p>
117	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 3 Tables of Assessment – Section 3.7.12 Tables of assessment for the Regional Infrastructure Overlay.	<p><b>Issue – MCU assessment benchmarks within water resource catchments and water supply buffer areas:</b></p> <p>The trigger for a material change of use where located in the Water resource catchments and water supply buffer areas varies the accepted development assessment benchmarks in the Seqwater guidelines (which in turn identify when assessable development occurs).</p> <p>Seqwater supports the inclusion of the on-site wastewater treatment system for the requirement for an application to include assessment against the Regional Infrastructure Code. However, the 'no change' wording is confusing.</p> <p>In addition, there are omissions from when development is made assessable or where the Regional Infrastructure Code becomes an assessment benchmark compared with items from Seqwater Development Guidelines Section 4.4 Assessment benchmarks for accepted development including:</p> <ul style="list-style-type: none"> <li>AC1.3 setbacks for wastewater facilities</li> <li>AC2.1 vegetation clearing (although it is acknowledged that vegetation clearing is addressed under the Vegetation Management Act)</li> <li>AC5 and AC6 storage and handling of dangerous goods, which is covered in the Flood hazard overlay code, and arguably addressed when a material change of use for activities requiring those hazardous substances is made.</li> </ul> <p>Seqwater notes these alternate requirements for making development assessable and supports that the location of on-site wastewater treatment is the most likely and most common risk where water quality within water catchments may be impacted. Seqwater acknowledges that other requirements for assessable development are required by other planning scheme and regulatory mechanisms (eg tree clearing, MCU for rural industry or industrial uses etc).</p> <p><b>Action:</b></p> <p>Review and amend the assessment requirements where necessary to ensure alignment Seqwater Development Guidelines Section 4.4 Assessment benchmarks for accepted development.</p>
118	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 3 Tables of Assessment – Section 3.7.12 Tables of assessment for the Regional Infrastructure Overlay.	<p><b>Issue – RAL assessment benchmarks within water resource catchments and water supply buffer areas:</b></p> <p>The Table of assessment identifies that for reconfiguring a lot, the Regional Infrastructure Overlay Code is an assessment benchmark when:</p> <ul style="list-style-type: none"> <li>Within a water resource catchment or water supply buffer area as identified on the Regional Infrastructure Overlay Map; and</li> <li>Increasing the number of lots.</li> </ul> <p>Rearrangement of boundaries in a water resource catchment area and water supply buffer area may lead to the relocation of allotments for residential use and as a result, careful consideration needs to be made about the location of wastewater disposal. The Regional Infrastructure Overlay Code contains the necessary assessment benchmarks to assess these relevant aspects where rearrangement of boundaries occurs.</p> <p><b>Action:</b></p> <p>Amend the trigger for reconfiguring a lot to include the rearrangement of boundaries to require an assessment against the Regional Infrastructure Overlay Code (ie. Specifically identify ROL (rearrangement of boundaries) in the Tables of assessment so that the Regional Infrastructure Code is identified as assessment benchmark.</p>
119	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural	Part 2 Strategic Framework – Section 2.2 Background and context of the Strategy Framework	<p><b>Issue:</b></p> <p>Source water catchments with the SCC LGA play a key role in the safety and security of drinking water for the SEQ region, which are not recognised in the sustainability references in the background and context.</p> <p><b>Action:</b></p> <p>Recognise that the Sunshine Coast LGA contains large and critical source water catchments that play a key role in the safety and security of drinking water for the entire SEQ region in the background and context of the strategic framework.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		hazards risk and resilience		
120	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 2 Strategic Framework – Section 2.4 Shaping Sustainable growth - 2.4.2 Strategic outcomes Element 6, SO6.8	<p><b>Issue:</b> Rural areas' role in ecosystem services and as water catchments are not appropriately reflected in the SO's for element 6 of section 2.4.</p> <p><b>Action:</b> The values of ecosystem services should be expressed in SO6.8 or in an additional outcome. It is recommended that the value of the green frame to the Sunshine Coast is contained in the air quality, water catchment and quality and open space relief provided by hinterland areas. Water catchment values of hinterland areas continue to play an important role for the sustainability of the Sunshine Coast.</p>
121	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 2 Strategic Framework - Section 2.5 A healthy and resilient environment – Element 3	<p><b>Issue:</b> Element 3 recognises the value of waterways and catchments but does not directly link to the provision of bulk water supply.</p> <p><b>Action:</b> Recommend a more direct and stated link to water catchment and bulk water storage so that the link between the protection and value of water supply catchments and bulk water storages is overtly stated. (Although it is acknowledged that this is stated in Element 9). For example, SO3.2 could add a statement that adds 'including supporting the provision of bulk water supply' (or similar wording).</p>
122	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 4 – Zones - Section 4.24 Rural Zone	<p><b>Issue:</b> Sensitive receiving environments are present in the Rural Zone, although at considerably lower intensity than the Rural Residential Zone, it may be appropriate to ensure that more intensive Rural uses are assessed against outcomes that identify appropriate on-site treatment and disposal of effluent that maintain public health and avoid negative impacts on the natural environment.</p> <p><b>Action:</b> Include a performance outcome in the rural zone code equivalent to PO9 from the Rural Residential Zone, given the relevance of the outcome to Rural settings and potential rural uses.</p>
123	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 6 Overlay Codes  Section 6.13.2, PO6	<p><b>Action:</b> Provide advice to applicants directing them to SEQ Water's consent guidelines: <a href="https://www.seqwater.com.au/sites/default/files/2022-11/D-GDE-STD-001%20Seqwater%20Network%20Consent%20Guidelines%20%28GDE-00348%29%20v4.pdf">https://www.seqwater.com.au/sites/default/files/2022-11/D-GDE-STD-001%20Seqwater%20Network%20Consent%20Guidelines%20%28GDE-00348%29%20v4.pdf</a>.</p>
124	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience		<p><b>Issue - Natural Hazards risk and resilience - Natural hazards Emergency access plans – Dams:</b> The draft planning scheme does not describe potential dam failure hazards and does not include consideration of the Dam Emergency Action Plan flood extents which are available online. Seqwater raises this is a potential flood hazard.</p> <p><b>Action:</b> Seqwater encourages Council to consider the downstream impacts of flooding from the unlikely event of dam failure. In terms of flood risk, development downstream of dams in the areas mapped in an EAP would be vulnerable in the event of an emergency event.</p>
125	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural	Appendix 13	<p><b>Issue:</b> Appendix 13 outlines actions to achieve improved housing supply and diversity, and liveable communities in the Sunshine Coast LGA. It is however noted only the following two relevant actions are mentioned:</p> <ul style="list-style-type: none"> <li>• Action No. 12 - provide generous living landscapes, including deep planted landscapes which contribute to a relaxed, shady, leafy sub-tropical character</li> <li>• Action No. 13 - provisions for rainwater tanks</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		hazards risk and resilience		Seqwater raises the lack of mention of other possible actions that could achieve the vision and outcomes outlined in the Strategic Framework. There is also no mention of the importance of water contributing to liveability including lush green urban area, etc. <b>Action:</b> Include reference to other actions which may achieve the vision and outcomes relating to water, for example water efficiency, recycling, source substitution, energy recovery and stormwater harvesting. In the case of Beerwah FIA, there may be opportunities for integrated water management and a circular economy with the boarder BEMDA in the future.
126	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Zoning throughout the proposed planning scheme	<b>Zoning of SEQ Water properties</b> <b>Action:</b> Extensive list of locations with recommended zoning provided (please see attached list), along with general comments that: <ul style="list-style-type: none"> <li>For all dam walls and embankments, plus associated nearby infrastructure, 'Community Facilities Zone' is recommended</li> <li>All existing Seqwater Recreation areas are recommended to be included in either the 'Sport and Recreation Zone' or 'Community Facilities Zone'</li> <li>For all Seqwater lots in the Community Facilities Zone, zoning annotations for 'bulk water supply infrastructure' (pipelines, water treatment plants, water quality facilities, dam walls, weirs + adjoining management land) and 'public recreation' (Seqwater public recreation areas near lakes or otherwise) should be provided consistent with the existing or intended use on Seqwater-owned land.</li> </ul>
127	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 3 Tables of Assessment – Section 3.7.12 Tables of assessment for the Regional Infrastructure Overlay.	<b>Advice – OPW assessment benchmarks within water resource catchments and water supply buffer areas</b> The tables of assessment identify a range of criteria for when operational works requires an application. These differ from the Seqwater Development Guidelines' ('Seqwater guidelines') assessment benchmarks for accepted development for material change of use, reconfiguring a lot or operational work. The Seqwater Development Guidelines contain accepted development assessment benchmarks and where not complied with, requires a code assessment application. These accepted development assessment benchmarks are grouped together as follows: <ul style="list-style-type: none"> <li>Wastewater</li> <li>Vegetation management</li> <li>Stormwater quality and hydrology</li> <li>Excavation and filling</li> <li>Storage and handling of dangerous goods, hazardous substances or environmentally hazardous materials.</li> </ul> Excavation and filling requirements are arguably covered by the draft planning scheme triggers for an operational works application. As outlined above, the storage of dangerous goods is usually assessed in Rural industry or industry MCU applications or as a part of a Flood Hazard code assessment. However, the key recommendation is to ensure that an MCU becomes assessable development where: <ol style="list-style-type: none"> <li>the establishment, expansion or upgrading of an on-site wastewater treatment system; or</li> <li>an increase in the number of people being accommodated or working on the site.</li> </ol> As these triggers appear to be addressed, the strict alignment with the Seqwater Development Guidelines is not considered to be required.
128	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 3 Tables of Assessment – Section 3.7.12 Tables of assessment for the Regional Infrastructure Overlay.	<b>Issue:</b> A dwelling house in the water supply infrastructure buffer within the Regional Infrastructure Overlay Map is excluded from requiring an application. This requires further consideration as to whether a dwelling house should be assessed when it is within a water supply infrastructure buffer. <b>Action:</b> Seqwater recommends that no new dwelling houses be located in this water supply infrastructure buffer.
129	SEQ Water	SPP – Water Quality – Energy and water supply – Infrastructure integration – Natural hazards risk and resilience	Part 5 Local Plans	<b>Comment:</b> The most relevant local plans to water catchment management for water supply purposes are the hinterland local plans. Section 5.13: Mooloolah Valley Local Plan Area <ul style="list-style-type: none"> <li>Rural residential growth areas of Glenview and Mooloolah, where located in the dam catchment, require specific attention in the planning scheme to maintain high levels of water quality.</li> </ul> Section 5.18: Blackall Range Maleny Local Plan Area <ul style="list-style-type: none"> <li>Although Poona Dam is a minor water storage specific identification of Poona Dam is recommended.</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
Education Queensland				
130	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 4 – Zone Codes – 4.2 Low Density Residential Zone Code, Table 4.2A Assessment benchmarks for assessable development (PO8)  Part 4 – Zone Codes - 4.19 Community Facilities Zone Code, Table 4.19A Assessment benchmarks for assessable development (PO6)  Height Overlay Code	<p><b>Issue – Height limitations for educational establishments:</b></p> <p>Performance outcomes for the LDR zone, Community Facilities Zone and Height Overlay Code restrict the height of all development to two storeys in height, which may impact on the State’s ability to deliver State schools. The Department of Education aims to provide new state schools over land areas ranging from 2ha to 12ha. These land holdings are significant in area and are often constrained and requiring a bespoke built form outcome.</p> <p><b>Action:</b></p> <p>Amend the scheme to allow non-residential buildings such, as educational infrastructure, to exceed the height limitations.</p> <ul style="list-style-type: none"> <li>For example, amend performance outcomes to include: “The height of non-residential buildings does not adversely affect amenity of the area or of adjoining properties, and positively contributes to the intended built form of the surrounding area. To demonstrate compliance a visual impact assessment may be required.”</li> <li>Consider building height limits for parts of a school site, where adjoining residential development (e.g. maximum height limits are increased where greater than 10m from a shared boundary).</li> </ul>
131	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 4 – Zone Codes – 4.2 Low Density Residential Zone Code, Table 4.2B Consistent uses and potentially consistent uses in the Low-Density Residential Zone	<p><b>Issue:</b></p> <p>Educational establishments should be a consistent use in the LDR zone.</p> <p><b>Action:</b></p> <p>Include educational establishment as a consistent or potentially consistent use under community activity use.</p>
132	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 6 – Overlay Codes – 6.9 -Flood Hazard Overlay Code	<p><b>Issue:</b></p> <p>The Department of Education supports initiatives to improve flood resilience and safe outcomes. The proposed Flood Hazard Overlay Code includes several provisions which may impact on the future expansion of a number of existing State school sites within the Sunshine Coast Council area including AS4.1 &amp; PO4. The effect of these provisions is that both a Vulnerable Use (i.e. Childcare Centre) and Educational Establishment are required to be situated outside of the Probable Maximum Flood level, as per the flood immunity standards identified in Table 6.9C.</p> <p>The proposed flood immunity level exceeds the department’s site planning standards, as detailed in the New School Site Selection Guidelines 2023.</p> <p><b>Action:</b></p> <p>The department is seeking more information from Council on how the provisions will apply to the future use of flood impacted state school sites, in particular whether the provisions will restrict the department’s ability to provide/expand for a whole range of services (childcare, prep to secondary) within the school catchments throughout the Sunshine Coast.</p>
133	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 6 – Overlay Codes – 6.9 Flood Hazard Overlay Code	<p><b>Issue:</b></p> <p>The Department of Education Site Selection Guidelines 2023 include provisions which require that state schools are designed with consideration of:</p> <ul style="list-style-type: none"> <li>buildings should be in areas of the site not affected by inundation or overland flows</li> <li>building platform levels must be above the 1/100 Average Recurrence Interval (ARI) inundation level.</li> <li>building floor levels must be 500mm above the Q100 level or the relevant authority’s minimum floor requirements, whichever is greater.</li> <li>overland stormwater flow paths must be designed to ensure that water does not enter buildings during a 1/50 ARI rain event.</li> <li>pedestrian and vehicle access must be designed to allow suitable access and egress and the use of buildings follow a significant rain event.</li> </ul> <p>Ovals, car-parks and other uninhabitable infrastructure are not required to achieve flood immunity requirements.</p> <p><b>Action:</b></p> <p>The Department of Education requests flexibility to locate uninhabitable uses in areas of low-medium flood hazard.</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action																					
134	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 7 Use codes – 7.4 Childcare Centre Code	<p><b>Issue:</b></p> <p>The Department of Education is responsible for issuing licences to operate Childcare centres throughout Queensland. The Childcare Centre Code should reference the National Quality Framework and ensure alignment with the design provisions of the Education and Care Services National Regulations.</p> <p><b>Action:</b></p> <p>Ensure that 7.4 Childcare Centre Code aligns with the design provisions of the Education and Care Services National Regulations, for example the regulations require at least 7m² of clear outdoor space per child in play areas.</p>																					
135	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 8 Other development codes - Reconfiguring a Lot Code - Part 6 – Development Infrastructure	<p><b>Issue:</b></p> <p>State schools have specific infrastructure requirements and educational establishments that are not currently reflected in Part 6 of 8.5. This may prevent State schools from being efficiently and appropriately equipped with the infrastructure required to support educational needs.</p> <p><b>Action:</b></p> <p>Include specific infrastructure considerations for state schools, including:</p> <ul style="list-style-type: none"><li>the design of safe and efficient drop-off and pick-up zones,</li><li>implementation of enhanced pedestrian safety measures like reduced speed zones and secure crossings near schools,</li><li>ensuring adequate utility services to meet the higher demands of educational facilities; and</li><li>the integration of green spaces, parks and natural elements near schools must be deliberate, enhancing the educational environment.</li></ul> <p>(with references to DTMR’s “Planning for safe schools technical guideline” as appropriate.)</p>																					
136	Education QLD	SPP – Liveable communities – Infrastructure and services	8.8 – Other development codes - Transport and Parking Code	<p><b>Issue – Transport and Parking Code requirements:</b></p> <p>The proposed parking requirements do not align with the Department of Transport and Main Roads – ‘Planning for Safe Transport Infrastructure at Schools’ and introduce potentially conflicting alternative standards.</p> <p><b>Action:</b></p> <p>Amend 8.8 – Other development codes – Transport and Parking Codes, per the actions identified below to ensure alignment with the design standards used by Education QLD in planning and designing State schools (DTMR – Planning for Safe Transport Infrastructure at Schools).</p> <p><b>Issue:</b> Minimum on-site parking requirements for childcare centres and educational establishments</p> <p><b>Action:</b> Amend per below</p> <p>Table 1. s8.8 Transport and Parking Code – Extract from Table 8.8C Minimum on-site parking requirements</p> <table><tr><th>Land Use</th><th>Car spaces</th><th>Electric vehicle charging spaces</th><th>Service vehicle spaces</th><th>Short-stay spaces</th><th>Motorcycle/moped spaces</th><th>Bicycle and e-mobility device spaces</th></tr><tr><td>Childcare centre</td><td>1 space / 3.6 children</td><td>Not required</td><td>VAN + WCV (where &gt;200m GFA) &lt;200m no requirement</td><td>Required</td><td>Where ≤ 24 car spaces required – 0 spaces  Where &gt; 24 car spaces required - 2% of car spaces Required.</td><td>1 employee space / 100m GFA + 1 visitor space / 100m GFA</td></tr><tr><td>Educational Establishment*</td><td><b>For Schools:</b> Pick-up / drop-off — 20% of short-term supply  Short-term parking — 1 space / 12 students  Long-term parking — 0.9 spaces / staff member.  <b>For Preparatory and Special Education:</b> 1 space / 10 students</td><td>Sufficient spaces to accommodate the demand anticipated to be generated by the development.</td><td>Sufficient spaces to Accommodate the number of vehicles likely to be parked at any one time (with minimum 1 WCV bay + Occasional access for HRV).</td><td>Sufficient spaces to Accommodate the demand anticipated to be generated by the development</td><td>Where ≤ 24 car spaces required – 0 spaces  Where &gt; 24 car spaces required - 2% of car spaces required</td><td><b>For Primary Schools:</b> 1 space / 3 students in year 4 or higher + 1 space / 10 staff + 1 visitor space / 25% of student parking  <b>For Secondary / combined schools:</b> 1 space / 3 students + 1 space / 10 staff + 1 visitor space / 10% of student parking</td></tr></table> <p><i>*On-site parking requirements for a state school must be undertaken in accordance with the requirements outlined in the Department of Transport and Main Roads – ‘Planning for Safe Transport Infrastructure at Schools’, or where not otherwise contemplated - in accordance with the requirements outlined in this Table.</i></p> <p><b>Issue:</b> AS12.2 includes requirements for provision of queuing into a future school site. Mandating a minimum number of queuing spaces may not be suitable for school environments. Schools differ greatly in their size, location, student population, and urban planning contexts. Therefore, a more tailored approach might be necessary to address the unique traffic and safety challenges of each school.</p> <p><b>Action:</b> Amend AS 12.2 to remove reference to educational establishments and reference DTMR – Planning for Safe Transport Infrastructure at Schools.</p>	Land Use	Car spaces	Electric vehicle charging spaces	Service vehicle spaces	Short-stay spaces	Motorcycle/moped spaces	Bicycle and e-mobility device spaces	Childcare centre	1 space / 3.6 children	Not required	VAN + WCV (where >200m GFA) <200m no requirement	Required	Where ≤ 24 car spaces required – 0 spaces  Where > 24 car spaces required - 2% of car spaces Required.	1 employee space / 100m GFA + 1 visitor space / 100m GFA	Educational Establishment*	<b>For Schools:</b> Pick-up / drop-off — 20% of short-term supply  Short-term parking — 1 space / 12 students  Long-term parking — 0.9 spaces / staff member.  <b>For Preparatory and Special Education:</b> 1 space / 10 students	Sufficient spaces to accommodate the demand anticipated to be generated by the development.	Sufficient spaces to Accommodate the number of vehicles likely to be parked at any one time (with minimum 1 WCV bay + Occasional access for HRV).	Sufficient spaces to Accommodate the demand anticipated to be generated by the development	Where ≤ 24 car spaces required – 0 spaces  Where > 24 car spaces required - 2% of car spaces required	<b>For Primary Schools:</b> 1 space / 3 students in year 4 or higher + 1 space / 10 staff + 1 visitor space / 25% of student parking  <b>For Secondary / combined schools:</b> 1 space / 3 students + 1 space / 10 staff + 1 visitor space / 10% of student parking
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Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<p><b>Issue:</b> Acceptable Solutions AS13.1, AS15, AS16, AS25.1, AS26.1 specify guidelines for the minimum number of car parking spaces required in developments that include an educational establishment, specifically a school. These guidelines are elaborated in Table 8.8C. State schools exhibit a varied range of access methods, influenced by multiple factors that impact their car parking needs. These factors include:</p> <ul style="list-style-type: none"> <li>a) The geographical location of the school and the characteristics of its catchment area;</li> <li>b) The various modes of travel that are available and feasible for students and staff, encompassing the full spectrum of transportation options;</li> <li>c) The age range and demographic profile of the student body and the broader catchment community, which can significantly influence travel patterns;</li> <li>d) The availability and accessibility of public transportation options in the vicinity of the school; and</li> <li>e) The presence and quality of the surrounding infrastructure for walking and cycling, which can offer alternative modes of commuting.</li> </ul> <p>These factors underscore the unique and variable nature of transportation needs for state schools, which necessitates a more tailored approach to car parking requirements.</p> <p><b>Action:</b> Amend and remove minimum car parking requirements for state schools and replace with a statement requiring that car parking is provided in accordance with a Car parking and traffic Assessment and in accordance with DTMR's 'Planning for Safe Transport Infrastructure at Schools'. This suggestion is intended to ensure the provisions reflect the distinctive characteristics of access and transportation needs associated with state schools. This will acknowledge and accommodate the unique transportation patterns and infrastructure demands of state schools.</p> <p><b>Issue:</b> AS28.2 requires that onsite public transport is provided for an educational establishment involving more than 500 students. This requirement contradicts the requirements of the Department of Transport - Planning for Safe Transport Infrastructure at Schools Technical Guidance, which provides that public transport for busses should be designed with on-street bus bays rather than off-street facilities. The reasoning behind this recommendation considers:</p> <ul style="list-style-type: none"> <li>• <u>Integration with Existing Infrastructure:</u> On-street bus bays are often more seamlessly integrated into the existing public transport network. This integration ensures that school transport solutions are a part of the broader public transportation system, enhancing accessibility and efficiency.</li> <li>• <u>Safety and Accessibility:</u> On-street bus bays can offer safer and more accessible pick-up and drop-off points for students. They often provide clearer visibility for both drivers and pedestrians, reducing the risk of accidents.</li> <li>• <u>Traffic Flow and Congestion:</u> On-street bus bays can be designed to minimise their impact on overall traffic flow, reducing the potential for congestion and bottlenecks.</li> </ul> <p><b>Action:</b> Remove the provisions relating to public transport infrastructure for state schools and include an editor's note stating that educational establishments must comply with the DTMR guideline. This will ensure the proposed provisions are consistent with established transport policies, optimise safety and accessibility for students, and align school transport infrastructure with broader urban transport planning principles.</p>
137	Education QLD	SPP – Development and Construction	Zoning	<p><b>Issue:</b> All State schools should be appropriately zoned – Community Facility Zone.</p> <p><b>Action:</b> Review the zoning of the following schools and ensure they are zoned as Community Facility Zone:</p> <ul style="list-style-type: none"> <li>• Buderim Mountain State School</li> <li>• Mary Valley State College</li> <li>• Woombye State School</li> </ul>
138	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 7 Use codes – Community Activities Code – AS5.1	<p><b>Issue:</b> The Department of Education on a case-by-case basis delivers school infrastructure on school sites which are less than the desired minimum lot sizes for new school sites (per the New School Site Selection Guideline 2023). The Department of Education sees potential that the site cover threshold outlined in AS5.1 may be exceeded when delivering new schools or expanding existing schools within the Sunshine Coast Urban Corridor to respond to emerging growth.</p> <p><b>Action:</b> Amend the site coverage requirements of AS5.1 to allow for greater than 50% site cover for state schools in land constrained areas.</p>
139	Education QLD	SPP – Liveable communities – Infrastructure and services	Reconfiguring a Lot Code, 8.5 Purpose - For all Reconfigurations	<p><b>Issue:</b> The Department of Education aims to provide new schools in greenfield areas in accordance with its Desired Standard of Service. Provisions should be included in the Planning Scheme to encourage increased consultation and awareness of opportunities between Department of Education, Sunshine Coast Council and developers to determine new school requirements for a large-scale subdivision.</p> <p><b>The Sunshine Coast does not have large new urban areas except Palmview and Beerwah East (currently) under the draft planning scheme. In Palmview the school sites have been allocated. The same will occur in BEMDA which is a State controlled process.</b></p> <p><b>Action:</b> Include:</p> <ul style="list-style-type: none"> <li>• a purpose statement - "State community facilities (e.g. schools) are planned in proportion to the size of the development and local community needs.</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<ul style="list-style-type: none"> <li>an editor's note - "Department of Education works to a Desired Standard of Service to provide a new state primary school every 3,000 dwellings and a new state secondary every 8,000 dwellings - It is recommended that the Department of Education is consulted with for any large scale development (i.e. structure plan or subdivision which is likely to result in a combined ultimate total of more than 1,000 lots) to ensure adequate provision is made for new schools in the locality".</li> <li>A clause or note in PO13 stating "Note - Where land is provided for a state school, sufficient land is provided in accordance with the requirements of the Department of Education – New School Site Selection Guidelines 2023."</li> </ul>
140	Education QLD	SPP – Liveable communities and housing – Infrastructure and services	Planning Scheme Policies	<p><b>Issue:</b></p> <p>The Planning Scheme Policies provide guidance on how the planning scheme principles are to be applied to development and may influence requirements on future state school projects within the Sunshine Coast.</p> <p><b>Action:</b></p> <p>The department requests the opportunity to review the contents of these policies, when available, to better integrate State and local planning for future state schools.</p>
141	Education QLD	SPP – Liveable communities – Infrastructure and services	Planning Scheme	<p><b>Issue:</b></p> <p>The Department of Education understands that the proposed planning scheme may result in changes to the projected population densities throughout parts of the Sunshine Coast. The revised projections will be used to inform future state school network planning.</p> <p><b>Action:</b></p> <p>The Department of Education requests that the dwelling projections resulting from the change of zoning, densities and extent of development areas are provided during subsequent consultation undertaken as part of the LGIP (Volume 2 of the Planning Scheme) process.</p>
142	Education QLD	SPP – Liveable communities – Infrastructure and services	Part 2 – Strategic Framework, 2.4.2 Strategic Outcomes, Element 1: Managing Growth, SO1.16	<p><b>Issue:</b></p> <p>The Department of Education aims to plan for adequate schooling infrastructure in emerging communities. The Department of Education will continue to work with Sunshine Coast Council to ensure that appropriate schooling can be planned through projects such as the Sunshine Coast Infrastructure Coordination Plan.</p> <p>It is important to recognise that appropriate levels of state schooling infrastructure can be provided within growing communities.</p> <p><b>Action:</b></p> <p>Amend 2.4.2 SO1.16 as follows:</p> <p>“Urban living areas, suburban living areas, hinterland living areas, rural residential areas and new communities include appropriate open space and local and state community infrastructure to support the community.”</p>
Department of Resources				
143	DOR	SPP – Development and Construction – State Land,	Part 3 Tables of assessment 3.2 Tables of assessment – Material change of use	<p><b>Issue:</b></p> <p>Any activities that are occurring on state-owned land i.e. Reserve, Deed of Grant In Trust, Land Lease etc. have a requirement to be consistent with the purpose for which the tenure is granted. If council are proposing to undertake an activity on state land that is not consistent with the purpose of the tenure, then they may be required to make application to amend the purpose of the tenure. It is also important to note that any proposed activities being undertaken on state-land that are a material change of use or tidal works in nature will require an application to be lodged with Resources seeking Owners Consent to accompany any future development applications.</p> <p>A material change of use for multiple uses is accepted development if located on Council owned or controlled land. For example, within the Sport and Recreation Zone and the Open Space Zone, a material change of use for multiple uses such as tourist park, food and drink outlet, market, community use, etc is accepted development if located on Council owned or controlled land.</p> <p><b>Action:</b></p> <p>Include a definition of 'council-controlled land' within the planning scheme. Consider the information provided when drafting the definition.</p>
144	DOR	State Interest: Mining and extractive resources – Extractive resources SPP State Interest 6 – Extractive resources,	SC2.3 Strategic framework maps Map SF4 A Smart and Prosperous Economy – Economic Elements	<p><b>Issue:</b></p> <p>While Map SF4 – Economic Elements shows the resource processing areas of 14 of the 15 KRAs that are located within, or partly within the Sunshine Coast LGA, the separation areas, the transport routes and transport route separation areas are not shown. This approach means that KRA 89 Moy Pocket is not shown at all on the map despite being part of the separation area and the transport route and transport route separation being located within the LGA. All the elements of the KRAs should be included on the map as all KRA components are important land use planning provisions. It is accepted that the scale of the map may not allow for the different components of the KRA to be separately depicted, however the outline of each KRA inclusive of all the components within the LGA should, at a minimum, be included on the map. This will also allow for a clear line of sight between the strategic framework and the extractive resources overlay map and code.</p> <p><b>Action:</b></p> <p>The planning scheme must depict all components of the KRAs mapped within the Council area on Strategic framework Map SF4 – Economic Elements. It is recommended that the legend refer to Key Resource Areas rather than just the abbreviation as users of the scheme may not be aware of what the acronym stands for.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		policies 1 and 2		
145	DOR	State Interest: Mining and extractive resources – Extractive resources  SPP State Interest 6 – Extractive resources, policies 1 and 2	3.2 Tables of assessment – Material change of use  Table of assessment Part 3.7.7 Extractive Resources Overlay  SC2.4 Zone maps	<p><b>Issue:</b></p> <p>The proposed table of assessment for the Extractive resources overlay states that there is 'no change' to the category of development and assessment for an MCU or RaL in the Extractive resources overlay. This means that a user must refer to the table of assessment for the relevant zone to determine the category of development and assessment.</p> <p>This approach may make it more difficult for the community to clearly understand up-front how development will be dealt with in the Extractive resources overlay. Improvements to this part of the planning scheme would assist with communicating the effect of the scheme to the community during the public consultation period.</p> <p>It is recommended that a material change of use (MCU) for sensitive and incompatible land uses is assessable development within a KRA against the 6.8 Extractive Resources Overlay Code. Using the tables of assessment for zones is not the most reliable method for achieving this outcome as certain uses can be overlooked, and future changes to the tables of assessment for zones can inadvertently affect development within the Extractive Resources overlay.</p> <p>Several occurrences have been identified where the tables of assessment for zones would allow sensitive and incompatible land uses to be accepted development within a KRA. KRAs are located within the following zones:</p> <p>Resource/processing areas:</p> <ul style="list-style-type: none"> <li>• Rural zone</li> <li>• Industry zone</li> <li>• Community Facilities zone <ul style="list-style-type: none"> <li>◦ Annotated 9 for Extractive industry</li> <li>◦ Annotated 12 for Place of Worship</li> <li>◦ Annotated 18 for Substation</li> </ul> </li> <li>• Sport and Recreation zone</li> <li>• Environmental Management and Conservation zone</li> </ul> <p>Separation areas (including transport route separation areas):</p> <ul style="list-style-type: none"> <li>• Rural zone</li> <li>• Industry zone</li> <li>• Environmental Management and Conservation zone</li> <li>• Sport and Recreation zone</li> <li>• Community facilities zone <ul style="list-style-type: none"> <li>◦ Annotated 3 for Child care centre</li> <li>◦ Annotated 5 for Community Use</li> <li>◦ Annotated 7 for Educational establishment</li> <li>◦ Annotated 9 for Extractive industry</li> <li>◦ Annotated 12 for Place of Worship</li> <li>◦ Annotated 15 for Residential care facility/Retirement facility</li> <li>◦ Annotated 18 for Substation</li> <li>◦ Annotated 20 for Utility installation (Local utility – water supply)</li> <li>◦ Annotated 21 for Utility installation (Major utility – refuse)</li> <li>◦ Annotated 23 for Utility installation (Local utility)</li> </ul> </li> <li>• Rural residential zone</li> <li>• Low density residential zone</li> <li>• Low-Medium density residential zone</li> <li>• Emerging community</li> <li>• Local centre zone</li> <li>• Neighbourhood centre zone</li> <li>• Limited development (Landscape residential) zone</li> <li>• Open space zone</li> </ul> <p>For example the following uses were found to be accepted development in one or more of the aforementioned zones:</p> <ul style="list-style-type: none"> <li>• Community activities – Sensitive</li> <li>• Park - Incompatible</li> <li>• Home-based business (child care service) - Sensitive</li> <li>• Environment facility - Incompatible</li> <li>• Rooming accommodation (small scale) – Sensitive</li> <li>• Relocatable home park (Council owned or controlled &amp; other requirements) – Sensitive</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action			
				For example the following uses were found to be accepted development subject to requirements in one or more of the aforementioned zones: <ul style="list-style-type: none"><li>Dwelling house - Sensitive</li><li>Nature-based tourism (limited facilities camping) - Incompatible</li><li>Environment facility – Incompatible</li><li>Rooming accommodation (small scale) – Sensitive</li></ul> Further analysis has been completed in comparing the state mapping and proposed planning scheme mapping for existing KRAs in the Sunshine Coast Regional Council's LGA. See Appendix 2: Comparison of state mapping and proposed planning scheme mapping for KRA's. <b>Action:</b> a) Revise the Tables of assessment for zones to ensure no development for a material change of use is accepted development in a KRA. OR b) Retain categories of development and assessment unchanged within the Tables of assessment for zones but amend Part 3.7.7 of the planning scheme to clearly identify the proposed categories of development and assessment for all development within the Extractive resources overlay.			
146	DOR	SPP State Interest 6 – Extractive resources, policies 1 and 2	7.10 Extractive Industry Code  Table 7.10A Assessment benchmarks for assessable development - PO6	<b>Issue:</b>  Whilst it is preferable to avoid impacts on sensitive uses, this may not always be completely possible along a KRA transport route and it is important that access to the resources within KRAs is maintained. The proposed changes align the performance outcome more consistently with the purpose of the code. <b>Action:</b> Amend PO6 and the associated AS as follows: <table><tr><td><b>PO6.1</b> The safety and amenity of <b>road users and</b> sensitive land uses adjacent to a transport route is not compromised by the vehicles transporting extractive materials.  <b>PO6.2</b> <b><u>Adverse impacts to the amenity of sensitive land uses adjacent to a transport route are minimised to the greatest extent reasonably practicable.</u></b></td><td><b>AS6.1</b> The transport route is on roads that are designed and constructed to a standard to meet the needs of the traffic generated by the use without compromising the safety and amenity of <b>road users and</b> sensitive land uses adjacent to the transport route.  <b>AS6.2</b> <b><u>No acceptable solution provided.</u></b></td></tr></table>		<b>PO6.1</b> The safety and amenity of <b>road users and</b> sensitive land uses adjacent to a transport route is not compromised by the vehicles transporting extractive materials.  <b>PO6.2</b> <b><u>Adverse impacts to the amenity of sensitive land uses adjacent to a transport route are minimised to the greatest extent reasonably practicable.</u></b>	<b>AS6.1</b> The transport route is on roads that are designed and constructed to a standard to meet the needs of the traffic generated by the use without compromising the safety and amenity of <b>road users and</b> sensitive land uses adjacent to the transport route.  <b>AS6.2</b> <b><u>No acceptable solution provided.</u></b>
<b>PO6.1</b> The safety and amenity of <b>road users and</b> sensitive land uses adjacent to a transport route is not compromised by the vehicles transporting extractive materials.  <b>PO6.2</b> <b><u>Adverse impacts to the amenity of sensitive land uses adjacent to a transport route are minimised to the greatest extent reasonably practicable.</u></b>	<b>AS6.1</b> The transport route is on roads that are designed and constructed to a standard to meet the needs of the traffic generated by the use without compromising the safety and amenity of <b>road users and</b> sensitive land uses adjacent to the transport route.  <b>AS6.2</b> <b><u>No acceptable solution provided.</u></b>						
147	DOR	SPP – State interest – Biodiversity, Policies 2, 3 & 4.	Part 3 Tables of assessment  3.5 Tables of assessment – Operational work  Table 3.5.1A Operational Work – All Zones  Schedule 1 Definitions  SC1.2 Administrative definitions:  'Exempt vegetation clearing'	<b>Issue:</b>  The current definition of 'Exempt Vegetation Clearing' makes operational work for necessary firebreaks or fire management lines assessable under the planning scheme.  Under Schedule 6, section 20A of the Planning Regulation 2017, the planning scheme is prohibited from stating operational work for necessary firebreaks or fire management lines is assessable development.  To ensure the planning scheme is consistent with the Planning Regulation 2017, the definition of 'Exempt Vegetation Clearing' is to be updated to include operational work for necessary firebreaks or fire management lines. <b>Action:</b> <ul style="list-style-type: none"><li>Update the definition of 'Exempt Vegetation Clearing' to include operational work for necessary firebreaks or fire management lines as outlined in Schedule 6, section 20A of the Planning Regulation 2017</li><li>Ensure the tables of assessment for the Biodiversity, Waterways and Wetlands Overlay Code is linked to the updated definition of 'Exempt Vegetation Clearing' to ensure operational work for necessary firebreaks or fire management lines is not made assessable.</li></ul>			
148	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 6 Overlay Codes  6.5 Biodiversity, Waterways and Wetlands Overlay Code	<b>Issue:</b>  The following statement in the Editor's Note for PO1 in Table 6.5E may inadvertently make some vegetation clearing (regulated by the planning scheme) exempt if it is considered exempt under State legislation (e.g. Planning Regulation 2017). This will prevent the planning scheme from avoiding and minimising impacts to MSES regulated vegetation. <b>Action:</b>  Revise Editor's Note for PO1 in Table 6.5E to ensure the planning scheme can avoid and minimise impacts to MSES.			



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			Table 6.5E	
149	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	OM4 - Biodiversity, Waterways and Wetlands Overlay Map  OM4(ii) - Matters of State Environmental Significance (MSES)	<p><b>Issue:</b> A comparison of Councils OM4(ii) - Matters of State Environmental Significance (MSES) against the State's mapping indicates that the map does not incorporate the most up-to-date MSES regulated vegetation mapping. The SPP MSES Regulated Vegetation layers were updated on 22 November 2023. As a result, the OM4(ii) overlay map is missing areas of MSES regulated vegetation</p> <p><b>Action:</b> Council to update OM4(ii) - Matters of State Environmental Significance (MSES) to incorporate the States most up-to-date MSES regulated vegetation mapping. The latest State-wide MSES regulated vegetation layers were published on 22 November 2023 and can be downloaded from QSpatial: Matters of State Environmental Significance – Regulated Vegetation.</p>
150	DOR	SPP State interest – emissions and hazardous activities (4) (a)	Part 2 Strategic framework – 2.7 A smart and prosperous economy - Element 10	<p><b>Issue:</b> There is a history of mineral sand mining along the coastline of the Sunshine Coast LGA. Notably, where processing of mineral sand has historically occurred, there may be elevated concentrations of naturally occurring radioactive material (NORM) including mineral stockpiles and tailing dumps. Providing a strategic outcome that recognises the importance of protecting community health and safety from previous mining activity that occurred specifically along the coastline, where land may be contaminated will facilitate protecting future land uses from associated hazards.</p> <p><b>Action:</b> Amend strategic framework s.2.7.2 by including the following strategic outcome: <i>SO10.9: Development protects community health and safety, sensitive land uses and the natural environment from hazards associated with former mineral sand mining of the coastline, including contaminated land.</i></p>
151	DOR	SPP State interest – emissions and hazardous activities (4) (a)	Part 4 – Zone Codes	<p><b>Issue:</b> Due to the potential hazards from former mining activities in the Sunshine Coast area, the scheme should include assessment benchmarks that require appropriate risk analysis to be undertaken to identify and mitigate risks to people and property where land is intended for redevelopment in a potential former mining area. Former mining activity is concentrated within areas zoned rural, environmental management and conservation and community facilities. Lot 35 AP23628 (Conondale Resources Reserve) is subject to former mining activity and as such, the current community facilities zoning may not appropriately reflect the constraints of the land.</p> <p><b>Action:</b> Consider assigning Lot 35AP23628 to the Limited Development Zone as it will more appropriately reflect the constraints and hazards of the land, resulting from former mining activity. Include the below assessment benchmarks for assessable development in zone codes for the following zones: a) If council chooses to incorporate above comment in relation to zoning change of Lot 35AP23628: 1. Limited development zone, 2. Environmental Management and Conservation zone, and 3. Rural zone. b) Alternatively, if council chooses not to retain the community facilities zone over Lot 35AP23628: 1. Community facilities zone, 2. Environmental Management and Conservation zone, and 3. Rural zone.</p> <p>Performance Outcome Site-specific geotechnical risks associated with former mining activities affecting the site are identified, and any geotechnical issues resulting from these works are assessed and mitigated to a tolerable level relevant to the proposed development. Note: A geotechnical assessment report prepared by a suitably qualified and experienced person will assist in demonstrating the achievement of the performance outcome.</p> <p>Acceptable Solution Development associated with sensitive or incompatible land uses is not located on sites of former mining activities (e.g. disused underground mines, contaminated land, mine openings and pits where a possible risk from former mining activities is identified through local knowledge, a pre-development ground inspection, or historical tenure, abandoned mines and resource layers on the GeoResGlobe, or other sources).</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
153	DOR	SPP – State interest – Biodiversity, Policy 2.	Schedule 1 Definitions / SC1.2 Administrative definitions:  Essential environmental infrastructure	<p><b>Issue:</b></p> <p>The current definition of ‘essential environmental infrastructure’ (see image below) does not incorporate MSES regulated vegetation matters as defined in the SPP.</p> <p>Council should update the definition of ‘essential environmental infrastructure’ to incorporate all MSES regulated vegetation matters as defined in the SPP (outlined below) to ensure they are appropriately captured and triggered within the planning scheme.</p> <p>The current definition of ‘essential environmental infrastructure’ does not clearly identify the relevant overlay map for each matter listed.</p> <p><b>Action:</b></p> <p>Amend the administrative definition of ‘essential environmental infrastructure’ to ensure it contains all MSES regulated vegetation matters as defined in the SPP.</p> <p>Essential environmental infrastructure means a Matter of National Environmental Significance (MNES), Matter of State Environmental Significance (MSES) or Matter of Local Environmental Significance (MLES) comprising:</p> <ul style="list-style-type: none"> <li>a. a natural waterway or wetland;</li> <li>b. an area of terrestrial habitat identified on the Biodiversity, Waterways and Wetlands Overlay Map, as: <ul style="list-style-type: none"> <li>i. core habitat area;</li> <li>ii. connecting habitat area;</li> <li>iii. urban habitat area; or</li> <li>iv. other habitat area;</li> </ul> </li> <li>c. a riparian protection area identified on the Biodiversity, Waterways and Wetlands Overlay Map;</li> <li>d. <b>regulated vegetation under the <i>Vegetation Management Act 1999</i> that is:</b> <ul style="list-style-type: none"> <li>i. <b>category B areas on the regulated vegetation management map, that are ‘endangered’ and ‘of concern’ regional ecosystems</b></li> <li>ii. <b>category C areas on the regulated vegetation management map that are ‘endangered’ and ‘of concern’ regional ecosystems</b></li> <li>iii. <b>category R areas on the regulated vegetation management map</b></li> <li>iv. <b>areas of essential habitat on the essential habitat map for wildlife prescribed as ‘endangered wildlife’ or ‘vulnerable wildlife’ under the <i>Nature Conservation Act 1992</i></b></li> <li>v. <b>category A, B, C or R areas on the regulated vegetation management map that are located within a defined distance from the defining banks of a relevant watercourse identified on the vegetation management watercourse and drainage feature map</b></li> <li>vi. <b>category A, B, C or R areas on the regulated vegetation management map that are located within a wetland or within 100 metres from the defining bank of a wetland identified on the vegetation management wetlands map; or</b></li> </ul> </li> <li>e. an area which otherwise: <ul style="list-style-type: none"> <li>i. contains or is likely habitat for threatened species under the <i>Nature Conservation Act 1992 (Qld)</i>, <i>Nature Conservation (Animals) Regulation 2020 (Qld)</i> or the <i>Nature Conservation (Plants) Regulation 2020 (Qld)</i>;</li> <li>ii. contains or is likely to contain listed threatened species and/or ecological communities, protected critical habitat or listed migratory species as defined by the <i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>;</li> <li>iii. contains or is likely habitat for species protected under international conservation agreements and/or species conservation plans;</li> <li>iv. contains protected marine plants or is defined as a fish habitat area under the <i>Fisheries Act 1994</i>;</li> <li>v. contains a spring as defined under the <i>Water Act 2000 (Qld)</i>;</li> <li>vi. contains habitat for flora or fauna species that are regionally significant in South East Queensland;</li> <li>vii. contains or is likely to contain species and/or ecological communities that are locally endangered, rare or threatened; or</li> </ul> </li> <li>f. a legally secured environmental offset area.</li> </ul> <p>In addition to the comment above, Council should amend the administrative definition of ‘essential environmental infrastructure’ to include a reference to the relevant sub-map/s within the Biodiversity, Waterways and Wetlands Overlay Maps for each matter listed within the definition.</p> <p>For example,</p> <ul style="list-style-type: none"> <li>f. a legally secured environmental offset area <b>identified on the OM4(ii) Matters of State Environmental Significance (MSES) Overlay Map.</b></li> </ul> <p>Alternatively, amend the definition of ‘essential environmental infrastructure’ to clearly identify that all matters included within the definition are identified on the Biodiversity, Waterways and Wetlands Overlay Map.</p> <p>For example,</p> <p>Essential environmental infrastructure means a Matter of National Environmental Significance (MNES), Matter of State Environmental Significance (MSES) or Matter of Local Environmental Significance (MLES) <b>identified on the Biodiversity, Waterways and Wetlands Overlay Map</b>, comprising: .....</p>
154		State Interest: Biodiversity – Matters of State Environmental Significance (MSES)	ZM1 Zone Map	<p><b>Issue:</b></p> <p>Proposed zoning changes from non-urban to urban and from Rural to Rural Residential (up-zoning) across the LGA include large areas of MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed land use intent of up-zoned areas is not consistent with the biodiversity values of the MSES vegetation and is not reflective of the SPP biodiversity state interest because it does not provide for retention of biodiversity values and will create clearing exemptions and development that are detrimental to biodiversity.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		SPP Policy 2, 3 and 4.		<p>To appropriately integrate the SPP Biodiversity State interest, up-zoning that impacts and fragments MSES must be avoided. This can be achieved by split-zoning or retaining the current zoning over land that contains MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed split-zoning or retention of current non-urban zoning will safeguard the vegetation from further subdivision and impacts of urban development and align zoning with the site's biodiversity values.</p> <p><b>Action:</b></p> <p>Amend the proposed re-zoning of properties identified in Appendix 3: Sunshine Coast PS Upzoning Analysis Table (below) to maintain the current non-urban zoning or where appropriate split zone.</p>
155	DOR	<p>SPP State Interest 6</p> <p>SPP State Interest 6 – Extractive resources</p> <p>Policy 1 and 2</p>	<p>2.7.2 Strategic outcomes</p> <p>Element 1 Growing the economy</p> <p>Planning Rationale – Supporting the traditional sectors</p>	<p><b>Issue:</b></p> <p>The Sunshine Coast's extractive resources are significant in enabling the construction sector (e.g. housing) and the provision of enabling infrastructure including renewable energy infrastructure. The strategic framework doesn't identify the significance of extractive resources in supporting economic development and the transition to a low carbon economy. For example, concrete is essential for providing affordable housing and renewable energy infrastructure (solar and wind farms) and associated transmission infrastructure development. Ensuring the economic supply - close to market to reduce transport costs - of extractive resources (sand, gravel, quarry rock, etc) is essential for underpinning sustainable development/growth on the Sunshine Coast. This is fundamental to the policy concept of KRAs which is to ensure extractive resources are available (protected from encroachment by incompatible uses) at a location close to urban areas where they can be supplied at an economical cost.</p> <p><b>Action:</b></p> <p>Include a strategic outcome that specifically recognises the significance of extractive resources in supporting construction and key enabling infrastructure in the Sunshine Coast LGA.</p>
156	DOR	<p>SPP State Interest 6 – Extractive resources</p> <p>Policy 1</p>	<p>2.7.2 Strategic outcomes</p> <p>2.7 Element 10 Natural economic resources</p>	<p><b>Issue:</b></p> <p>Users of the scheme may not necessarily associate the concept of Key Resource Areas with extractive resources. It is also important to identify the different elements of KRAs.</p> <p><b>Action:</b></p> <p>Amend SO10.1 (a) to refer to: extractive resources within key resource areas (KRAs), local resource areas and their associated separation areas haulage and transport routes</p>
157	DOR	<p>SPP State Interest 6 – Extractive resources</p> <p>Policy 1 and 2</p>	<p>6.8 Extractive Resources Overlay Code</p> <p>6.8.1 Purpose (a) &amp; (c)</p>	<p><b>Issue:</b></p> <p>The wording of 6.8.1 does not adequately align with SPP State Interest 6 – Extractive resources, policies 1 and 2</p> <p><b>Action:</b></p> <p>Amend 6.8.1 (a) as follows: avoiding encroachment by <u>sensitive and other</u> incompatible land uses <u>in the resource/processing area and related separation area that could impede the extraction of the resource</u> may compromise the ability of the extractive use area to be used efficiently and sustainably for extractive purposes;</p> <p>Amend 6.8.1 (c) as follows: maintaining <u>transport route</u> separation areas <u>by avoiding land uses and development that will compromise the ongoing use of the haulage route for the extractive materials</u> to avoid alienation of the extractive resource and resource operations, and provide for safe and efficient transport to and from the resource/processing area</p>
158	DOR	<p>SPP State Interest 6 – Extractive resources</p> <p>Policy 1 and 2</p>	<p>6.8.2 Assessment benchmarks for assessable development</p> <p>Table 6.8A</p> <p>PO1(b)</p>	<p><b>Issue:</b></p> <p>Uses incompatible with extractive industry are not necessarily always sensitive uses. Both sensitive and incompatible uses should meet the performance outcome.</p> <p><b>Action:</b></p> <p>Amend PO1 (b) as follows</p> <p>Introduce a new use or increase the scale and intensity of an existing use, that is sensitive to, <u>or incompatible with</u>, the impacts of an extractive industry.'</p>
159	DOR	<p>SPP State Interest 6 – Extractive resources</p> <p>Policy 1 and 2</p>	<p>SC1.2 Administrative definitions</p> <p>Table SC1.2B Administrative definitions</p>	<p><b>Issue:</b></p> <p>When assessing proposals for caretaker's accommodation associated with an industrial use within a KRA, unless the caretaker is associated with the extractive industry, the use should be considered as a sensitive use.</p> <p><b>Action:</b></p> <p>Amend the wording for the defined sensitive land use as follows:</p> <p>a) caretaker's accommodation (other than where located in an industrial zone and <u>where outside of a KRA unless associated with extractive industry</u>)</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
160	DOR	SPP State Interest 6 – Extractive resources  Policy 1 and 2	Extractive Resources Overlay Map OM7	<p><b>Issue:</b> For consistency with the State Planning Policy (SPP) KRAs should be identified in the planning scheme inclusive of their name and number.</p> <p><b>Action:</b> Annotate the Extractive Resources Overlay Map OM7 to identify the KRAs by name and number</p>
161	DOR	State Interest: Biodiversity – Matters of State Environmental Significance (MSES)  SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 2 Strategic Framework  2.4 Shaping sustainable growth  2.4.2 Strategic outcomes  Element 1: Managing Growth	<p><b>Issue:</b> There are large patches of MSES - regulated vegetation within the existing local growth management boundaries. It is recommended that Council aims to avoid adverse impacts and fragmentation to MSES regulated vegetation if future development is undertaken in these areas.</p> <p><b>Action:</b> Ensure the SPP biodiversity principle of avoiding and minimising impacts to matters of state environmental significance (MSES) is clearly incorporated into <b>SO1.5</b> especially in relation to local growth management boundaries.</p> <p>See example below as one way of achieving this.</p> <p><b>SO1.5</b> Urban and rural residential development is contained within defined local growth management boundaries <b><u>and avoids impacts to essential environmental infrastructure. Where impacts cannot be avoided, they should be minimised and mitigated.</u></b></p>
162	DOR	SPP – State interest – Biodiversity, Policy 4	Part 2 Strategic Framework  2.5 A healthy and resilient environment  2.5.2 Strategic outcomes  Element 1: Essential Environmental Infrastructure  Element 2: Biodiversity	<p><b>Issue:</b> The current wording in 2.5.2 of the Strategic Framework does not clearly incorporate the biodiversity state interest Policy 4, that ecological processes and connectivity is maintained and enhanced by avoiding fragmentation to MSES.</p> <p><b>Action:</b> Amend SOs in 2.5.2 to clearly incorporate the SPP biodiversity Policy 4 principle of maintaining and enhancing ecological processes and connectivity by avoiding fragmentation to MSES.</p> <p>For example <u>Element 1</u> Amend SO1.1 Remnant and non-remnant native vegetation, natural waterways and wetlands, coastal environments and other important terrestrial and aquatic habitat areas including matters of national, state and local environmental significance (MNES, MSES and MLES) are recognised as essential environmental infrastructure providing essential ecosystem services <b><u>and connectivity</u></b> supporting the Sunshine Coast's biodiversity, economic activity, resilience, character, community and cultural identity, health and wellbeing.</p> <p><u>Element 2</u> Amend SO2.2 as follows: A network of ecological linkages is established, rehabilitated and protected from <b><u>fragmentation</u></b> to build, <b><u>maintain and enhance</u></b> connectivity between <b><u>essential environmental infrastructure</u></b>, important habitat areas and improve ecological function and resilience.</p> <p>OR Include an additional strategic outcome as follows: <b><u>SO2.x</u></b> <b><u>Existing ecological processes and connectivity is maintained or enhanced by avoiding fragmentation of essential environmental infrastructure.</u></b></p>
163	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 3 Tables of assessment  3.5 Tables of assessment – Operational work	<p><b>Issue:</b> Only some areas of MSES regulated vegetation are identified as core habitat area, connecting habitat area, urban habitat area, other habitat area, waterway or wetland on the Biodiversity, Waterways and Wetlands Overlay Map. Therefore, the current definition of exempt vegetation clearing (general exemptions) appears to make clearing of MSES regulated vegetation exempt. It is recommended that Council incorporate the suggested changes to ensure the planning scheme is consistent with the SPP Biodiversity state interest.</p> <p><b>Action:</b> Within the definition of Exempt Vegetation Clearing, amend point b) to include all matters of MSES regulated vegetation identified on the Biodiversity, Waterways and Wetlands Overlay Map.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			Table 3.5.1A Operational Work – All Zones  Schedule 1 Definitions  SC1.2 Administrative definitions: <ul style="list-style-type: none"> <li>Exempt vegetation clearing</li> </ul>	
164	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Schedule 1 Definitions  SC1.2 Administrative definitions: <ul style="list-style-type: none"> <li>Exempt vegetation clearing</li> <li>Property Maintenance Activities</li> </ul>	<p><b>Issue:</b> There are inconsistencies between property maintenance activity definitions in the planning scheme compared with those outlined in Schedule 21 of the Planning Regulation, Schedule 6, 20A outlines these exemptions that are not able to be made assessable under the planning scheme. For example, clearing for establishing or maintaining a necessary firebreak.</p> <p><b>Action:</b> Revise the definition of ‘property maintenance activities’ to ensure it is consistent with those outlined in Schedule 21 and Schedule 6, 20A of the Planning Regulation.</p>
165	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 6 Overlay codes  6.5 Biodiversity, Waterways and Wetlands Overlay Code  6.5.3 Assessment benchmarks for assessable development  Table 6.5E	<p><b>Issue:</b> The separation distances outlined in acceptable solution AS8.1 only relate to essential environmental infrastructure comprising terrestrial habitat.  It is recommended that Council amend AS8.1 to include separation distances for MSES regulated vegetation. This will ensure the acceptable solution is consistent with the SPP Biodiversity Policy 2 that development is located in areas that avoid adverse impacts to MSES (regulated vegetation) and will protect against the impacts of edge effects (e.g. pests, weeds, fire, human influence).</p> <p><b>Action:</b> Amend acceptable solution AS8.1 to include separation distances for MSES regulated vegetation in addition to terrestrial habitat.</p>
166	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 6 Overlay codes  6.5 Biodiversity, Waterways and Wetlands Overlay Code  6.5.3 Assessment benchmarks for assessable development	<p><b>Issue:</b> The mapped buffer distance for wetlands (within urban and non-urban areas, irrespective of the wetlands size) captured as Riparian Protection Areas within OM4(iii)b Matters of Local Environmental Significance (MLES) - Waterways and Wetlands, should be increased to 100m.  These changes are required for acceptable outcome AS8.2 of PO8 to sufficiently capture the setback buffer distances for wetlands, defined within the State code 16: Native Vegetation Clearing (State code 16) of the SDAP. This will ensure the acceptable solution is consistent with the SPP Biodiversity Policy 2 that development is in areas that avoid adverse impacts to MSES (regulated vegetation) and will protect against the impacts of edge effects (e.g. pests, weeds, fire, human influence).</p> <p><b>Action:</b> Update the mapped buffer distances for Riparian Protection Areas within OM4(iii)b Matters of Local Environmental Significance (MLES) - Waterways and Wetlands for the following wetland areas:</p> <ul style="list-style-type: none"> <li>All wetlands &gt;0.5ha – <del>50m</del> <b>100m</b> (urban and non-urban areas)</li> <li>All wetlands &lt;0.5ha – <del>25m</del> <b>100m</b> (urban and non-urban areas)</li> </ul> <p>The suggested changes are to ensure the separation distances for wetlands mapped as Riparian Protection Areas align with the setback buffer distances defined in State code 16.</p>
167	DOR	SPP – State interest – Biodiversity, Policy 2, 3 & 4.	Part 6 Overlay codes  6.5 Biodiversity, Waterways and Wetlands Overlay Code	<p><b>Issue:</b> The line of sight for the biodiversity state interest (which includes MSES regulated vegetation) throughout the planning scheme is inadequate due to inconsistent terminology used to describe the interest and corresponding definitions not including all matters of MSES regulated vegetation.  For example, the planning scheme includes numerous assessment benchmarks related to essential environmental infrastructure, however, does not include any link to the relevant overlay map. By not identifying that the matters comprising essential environmental infrastructure are identified in the Biodiversity, Waterways and Wetlands Overlay Map, there is no clear link or trigger to the Biodiversity, Waterways and Wetlands Overlay Code within the assessment benchmarks.</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			6.5.3 Assessment benchmarks for assessable development	<p><b>Action:</b></p> <p>Revise terminology used throughout the planning scheme to consistently identify MSES regulated vegetation through the strategic framework, tables of assessment, Biodiversity, Waterways and Wetlands Overlay Code and Maps and the Vegetation Management Code. Consider if essential environmental infrastructure is the appropriate terminology to represent the biodiversity state interest.</p> <p>AND</p> <p>Update all assessment benchmarks relating to 'essential environmental infrastructure' to identify that all matters included within the definition are identified on the Biodiversity, Waterways and Wetlands Overlay Map.</p>
168	DOR	SPP State Interest - emissions and hazardous activities  7 (a-c)	Part 6 Overlay codes 6.2 Acid Sulfate Soils Overlay Code 6.2.1 Purpose	<p><b>Issue:</b></p> <p>Acid Sulfate Soils (ASS) and groundwater are not just affected by groundwater extraction. Groundwater disturbance in ASS can occur by various means, including alteration of surface water flow, and alteration of groundwater levels by extraction and installation of drains.</p> <p><b>Action:</b></p> <p>Amend point a) in the purpose statement include avoiding disturbance of acid sulfate soils when <u>altering surface water flows</u> and <u>altering groundwater levels</u>. See the below example as a way of achieving this: <i>a) avoiding disturbance of acid sulfate soils (ASS) when excavating or otherwise removing soil or sediment, <u>altering surface water flows, altering groundwater levels</u>, or filling land; or</i></p>
169	DOR	SPP State Interest - emissions and hazardous activities  7 (a-c)	Part 6 Overlay codes 6.2 Acid Sulfate Soils Overlay Code 6.2.3 Assessment benchmarks for assessable development  Table 6.2B	<p><b>Issue:</b></p> <p>The SPP – Emissions and Hazardous Activities states that disturbance of acid sulfate soils should firstly be avoided and then minimised where avoidance is not possible. The suggested changes to PO1 point b) are to ensure the planning scheme clearly incorporates the avoid and minimise principle.</p> <p><b>Action:</b></p> <p>Amend point b) in PO1 to clearly incorporate the principle that disturbance of acid sulfate soils should be minimised when it cannot be avoided.</p> <p><b><u>(b)Where disturbance is not possible. ASS disturbance is minimised and</u></b> managed to avoid <del>and minimise</del> the release or transport of acid and metal contaminants where disturbance of ASS is unavoidable.</p>
170	DOR	SPP State Interest - emissions and hazardous activities  7 (a-c)	Part 6 Overlay codes 6.2 Acid Sulfate Soils Overlay Code 6.2.3 Assessment benchmarks for assessable development  Table 6.2B	<p><b>Issue – Acid Sulfate Soils:</b></p> <p>Changes are proposed to ensure the acceptable solutions clearly articulate the steps required to avoid and minimise disturbance to ASS.</p> <p><b>Action:</b></p> <p>It is recommended that Council incorporate the following suggested changes to the acceptable outcomes for PO1 to ensure the planning scheme clearly articulates the requirements for avoiding and minimising disturbance of acid sulfate soils (ASS):</p> <p>AS1.1</p> <p>The presence/absence of ASS is assessed in relation to the proposed works by undertaking ASS investigations conforming to the National Acid Sulfate Soils Guidance material and, where necessary, performing soil analysis according to the Queensland Laboratory Methods Guidelines/<u>Australian Standard 4969</u>.</p> <p>AS1.2</p> <p>The disturbance of ASS is avoided by:</p> <ul style="list-style-type: none"> <li>a. not excavating or otherwise removing soil or sediment containing ASS;</li> <li>b. not permanently or temporarily altering surface water flow and/or groundwater levels resulting in the aeration of previously saturated ASS; and</li> <li>c. not undertaking filling on land at or below 5m AHD, that results in:</li> <li>d. actual ASS being moved below the water table; or</li> <li>e. previously saturated ASS being aerated.</li> </ul> <p>OR</p> <p>AS1.3</p> <p>Where disturbance of ASS cannot be avoided, an ASS management plan is prepared in accordance with the Soil Management Guidelines v5.0, National Acid Sulfate Soils Guidance material and Planning Scheme Policy for the Acid Sulfate Soils Overlay Code. The ASS management plan ensures the proposed works avoid the release of acid and metal contaminants by:</p> <ul style="list-style-type: none"> <li>a. neutralising existing acidity and preventing the generation of acid and metal contaminants; and</li> <li>b. preventing the release of surface or groundwater flows containing acid and metal contaminants into the environment.</li> </ul> <p>Editor's note – The National Acid Sulfate Soils Guidance material, Laboratory Methods Guidelines and Soil Management Guidelines referenced in AS1.1 and AS1.3 can be located on the Queensland Government website at Guidance materials for acid sulfate soils.</p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
171	DOR and DESI	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Zoning inconsistent with mapped matters of State significance (MSES):</b></p> <p>Proposed zoning changes from non-urban to urban and from Rural to Rural Residential (up-zoning) across the LGA include large areas of MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed land use intent of up-zoned areas is not consistent with the biodiversity values of the MSES vegetation and is not reflective of the SPP biodiversity state interest because it does not provide for retention of biodiversity values and will create clearing exemptions and development that are detrimental to biodiversity.</p> <p>To appropriately integrate the SPP Biodiversity State interest, up-zoning that impacts and fragments MSES must be avoided. This can be achieved by split-zoning or retaining the current zoning over land that contains MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed split-zoning or retention of current non-urban zoning will safeguard the vegetation from further subdivision and impacts of urban development and align zoning with the site's biodiversity values.</p> <p>Lots proposed for Rural Residential containing significant MSES:</p> <ul style="list-style-type: none"> <li>• Lot 2 on RP194318</li> <li>• Lot 10 on RP803673</li> <li>• Lot 2 on SP142145</li> <li>• Lot 7 on SP274299</li> <li>• Lot 1 on RP124727</li> <li>• Lot 3 on SP258555</li> <li>• Lot 5 on SP258555</li> </ul> <p><b>Action:</b></p> <p>To preserve and protect the MSES on site, amend the zoning of the lots listed above. It is recommended that split zoning applied, with mapped MSES zoned for Environmental Management and Conservation.</p>
172	DOR and DESI	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Zoning inconsistent with mapped matters of State significance (MSES):</b></p> <p>Proposed zoning changes from non-urban to urban and from Rural to Rural Residential (up-zoning) across the LGA include large areas of MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed land use intent of up-zoned areas is not consistent with the biodiversity values of the MSES vegetation and is not reflective of the SPP biodiversity state interest because it does not provide for retention of biodiversity values and will create clearing exemptions and development that are detrimental to biodiversity.</p> <p>To appropriately integrate the SPP Biodiversity State interest, up-zoning that impacts and fragments MSES must be avoided. This can be achieved by split-zoning or retaining the current zoning over land that contains MSES-regulated vegetation and MSES connectivity.</p> <p>The proposed split-zoning or retention of current non-urban zoning will safeguard the vegetation from further subdivision and impacts of urban development and align zoning with the site's biodiversity values.</p> <ul style="list-style-type: none"> <li>• Lot 1 on SP293231 (<i>Proposed industrial</i>)</li> <li>• Lot 2 on RP155233 (<i>Proposed industrial</i>)</li> <li>• Lot 3 on RP172455 (<i>Proposed Sport and Recreation</i>)</li> <li>• Lot 100 on SP235756 (<i>Proposed community facilities</i>)</li> </ul> <p><b>Action:</b></p> <p>To preserve and protect the MSES on site, amend the zoning of the lots listed as follows:</p> <ul style="list-style-type: none"> <li>• Lot 1 on SP293231 and Lot 2 on RP155233 (<i>Proposed industrial</i>) – Split zoning recommended with MSES to be zoned for Environmental Management and Conservation Zone</li> <li>• Lot 3 on RP172455 (<i>Proposed Sport and Recreation</i>) – Zoning not supported – Environmental Management and Conservation Zone recommended</li> <li>• Lot 100 on SP235756 (<i>Proposed community facilities</i>) – Retain rural zoning</li> </ul>
173	DOR and DESI	SPP – Environment and heritage – Biodiversity	Schedule 2 - SC2.4 Zone maps	<p><b>Zoning of unallocated state land parcels:</b></p> <ul style="list-style-type: none"> <li>• Lot 5 on SP228615 - It is recommended that the subject USL parcel is removed from the Community Facilities Zone. A Rural Zoning would be more appropriate and consistent with surrounding Rural zoned areas.</li> <li>• Lot 66 on USL31034 - It is recommended that the subject USL parcel is removed from the Community Facilities Zone. A Rural Zoning would be more appropriate and consistent with surrounding Rural zoned areas.</li> <li>• Lot 957 on CP845367 - The current Medium Density Residential Zone should be retained as the site is contiguous to other medium density areas.</li> </ul>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
174	DOR	SPP– Extractive resources	Schedule 2 - SC2.4 Zone maps	<p><b>Issue – Protecting designated haulage routes associated with extractive industries:</b></p> <p>Proposed zoning changes to land adjacent to key resource areas from rural uses to urban uses may encourage incompatible or sensitive land uses proximate to extractive industry and affect the safety and operation of existing designated haulage routes.</p> <p><b>Advice:</b></p> <p>Consider how the proposed planning scheme will protect existing haulage routes. This may be achieved by amending the proposed zoning of land to prevent incompatible uses, or introducing performance outcomes which limit the approval of new access to haulage routes where alternative access is viable. Mapping haulage routes on the appropriate overlay may be required.</p>
175	DOR	SPP State interest – emissions and hazardous activities (4) (a)	Attachment 2 - Sunshine Coast Planning Scheme - State Interest Review Report	<p><b>Comment:</b></p> <p>‘Attachment 2 - Sunshine Coast Planning Scheme - State Interest Review Report’ identifies that no former mines exist on the Sunshine Coast in addressing State interest - emissions and hazardous activities policy (4) (a). The term “former mining activity” used in the SPP encompasses a broad range of features and hazards left in the landscape.</p> <p>Former mining activity has occurred sporadically throughout the Sunshine Coast Regional Council LGA (e.g. in proximity to Conondale, Maleny, Nambour, North Arm and along the coastline), which may have resulted in remaining hazards such as contaminated land, mine openings and pits.</p>
176	DOR	SPP State interest – emissions and hazardous activities (4) (a)	Schedule 2 – Mapping – SC2.4 Zone Maps	<p><b>Comment:</b></p> <p>There is a significant history of mining across the Sunshine Coast Regional Council LGA which may have resulted in remaining hazards such as mine openings, pits and contaminated land.</p> <p>No proposed intensified land use changes on land known to be subject to former mining activity have been identified.</p> <p>However, it is recommended that for future land use changes, land subject to former mining activity is not promoted for intensification of use, up-zoning or subdivision.</p> <p>If up-zoning/intensification of use is needed, it is recommended that proposed development be required to undertake investigations (e.g. desktop assessment and geotechnical where required) to identify hazard/risk and if required, demonstrate effective mitigation measures and ensure controls are in place to appropriately address any potential hazards associated with former mining activities.</p>
Department of Transport and Main Roads				
177	DTMR	SPP, Strategic Airports and Aviation Facilities (1,2)	Part 6 Overlays  6.4 Airport Environs Overlay Code  Table 6.4B Assessment benchmarks for assessable development	<p><b>Issue:</b></p> <p>The code does not adequately avoid all high risk uses according to the example planning scheme assessment benchmarks, or the National Airports Safeguarding Framework guideline C, Attachment 1.</p> <p>Additionally, The intended objective is not to increase the number of people living, working, or congregating in the Public Safety Area (<i>Strategic airports and aviation facilities state interest Example planning scheme assessment benchmarks</i>).</p> <p><b>Action:</b></p> <p>Revise AS 2.1 to 2.5 to reflect the intent of the example code for wildlife hazards on page 4 of Strategic airports and aviation facilities state interest Example planning scheme assessment benchmarks and National Airports Safeguarding Framework Guideline C.</p> <p>The outcomes should state putrescible waste facility and major sport facilities are uses that are not to occur within the <b>3 km</b> wildlife hazard buffer.</p> <p>And</p> <p>Remove the word “significantly” from AS7 (a)</p>
178	DTMR	SPP-Transport infrastructure	Part 5 Local plans	<p><b>Issue – Local plans:</b></p> <p>For legibility Primary and Secondary ‘active frontages’ should be further applied along the entirety of the coastal corridor to support public transport and active transport outcomes.</p> <p><b>Action:</b></p> <p>Minimise road designation change along the coastal corridor mass transit route.</p>
179	DTMR	SPP-Transport infrastructure	Schedule 2 Mapping –	<p><b>Issue – Kawana Motorway Project:</b></p> <p>The Kawana Motorway Project, and its continuation onto the Mooloolah River interchange, is not referenced or mapped as a future State Transport Corridor in the planning scheme. This may result in inappropriate uses within the project corridor and affect the State’s ability to effectively deliver the infrastructure.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			SC2.6 Overlay maps – Regional Infrastructure	<b>Action:</b> Amend the scheme where necessary, including the Regional Infrastructure Overlay Map, to ensure this part of the Kawana Motorway project is appropriately represented from a statutory perspective according to its current status. Contact the Department of Transport and Main Roads (North Coast) for details of the alignment if required.
180	DTMR	SPP-Transport infrastructure	Whole of Scheme	<b>Issue – Naming convention:</b> The Direct Sunshine Coast Rail Line is inconsistently referred to throughout the planning scheme. Some (but not all) examples include references to “Direct Sunshine Coast Rail link” or “Direct Sunshine Coast Rail connection” in: <ul style="list-style-type: none"> <li>Part 1 Strategic Framework pages 2 and 3,</li> <li>Part 5 Local Plans, pages 3,4,5 and 39.</li> </ul> <b>Action:</b> Amend the scheme to refer to Direct Sunshine Coast Rail Line consistently.
181	DTMR	SPP-Transport infrastructure	Map 5.3A Buderim Local Plan Elements	<b>Comment:</b> The proposed new road links are consistent with NCR understanding. This is being proposed to better connect Sippy Downs with Buderim. <b>Advice;</b> TMR recommends showing the Power Road overpass which is important from an accessibility and permeability aspect. Please include future local road overpass in the LAP.
<b>DHLGPPW - Natural Hazards</b>				
182	DHLGPPW	Section 13.1.4.2 of Integrating state interests in a planning scheme - Guidance for local governments	Part 6.9 - Flood Overlay Code	<b>Issue - Flood Hazard – Storage of hazardous materials</b> <b>Assessment benchmarks do not comply with the requirements of the SPP.</b> Assessment benchmarks within the draft planning scheme need to be carefully drafted and well-conceived, to ensure they satisfy all of the requirements of the SPP. The SPP guidance for Integrating state interests in a planning scheme - Approach for plan drafting for Flood – Consideration 21, requires assessment benchmarks to include evacuation plans to safely remove hazardous materials to alternative sites are in place in the event of a flood. Whilst PO17 of the draft Flood Hazard Overlay includes provisions for storage of hazardous materials, the code does not specify the option of an evacuation plan for hazardous materials. <b>Action:</b> The council is to review and amend the draft planning scheme to ensure that assessment benchmarks (including acceptable solutions) incorporate the requirements of the SPP, specifically the safe removal of hazardous materials to alternative sites. Acceptable solutions that do not incorporate the requirements of the SPP are not supported.
183	DHLGPPW	SPP – Part C – Purpose and guiding Principles: Outcomes focused  Section 13.1.4 of Integrating state interests in a planning scheme - Guidance for local governments	Part 6.9 - Flood Overlay Code, and Part 6.12 - Landslide Hazard and Steep Land Overlay Code	<b>Natural Hazards</b> <b>Issue:</b> <b>Assessment benchmarks within acceptable solutions are not robust enough to comply with the requirements of the SPP.</b> Given that the construct of most planning schemes is that satisfying an acceptable solution (AS) is taken to then satisfy its associated performance outcome (PO), AS's as well as PO's need to be carefully drafted and well-conceived, to ensure they satisfy the requirements of the SPP. In numerous situations throughout the draft planning scheme, the PO's provided satisfy the requirements of the SPP, however the AS's do not. For example: <ul style="list-style-type: none"> <li>The SPP guidance for Integrating state interests in a planning scheme - Approach for plan drafting for Flood – Consideration 17(4) requires the retention or enhancement of riparian corridors and vegetation that provide a protective function during flood events, maintain the natural function of the floodplain and potentially reduce the need for built mitigation infrastructure</li> </ul> Whilst PO8(b)(iii) of the draft Flood Hazard Overlay includes provisions for - natural landforms, natural waterways and natural drainage lines to be maintained to protect the hydraulic performance of waterways, the associated AS does not include a level of protection for retention or enhancement of riparian corridors and vegetation that provide a protective function during flood events

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
				<ul style="list-style-type: none"> <li>Similarly, the SPP guidance for Integrating state interests in a planning scheme - Approach for plan drafting for Landslide – Consideration 4, 10 and 12(5) requires the retention of existing vegetation or limiting vegetation clearing, that can mitigate risks of landslide</li> </ul> <p>Whilst PO4.3 of the draft Landslide Hazard Overlay includes provisions for development to minimise impacts on the natural landform and vegetation, the associated AS requires mitigation measures after the impact to the natural landform or vegetation clearing has occurred.</p> <p><b>Action:</b></p> <p>The council is to review and amend the draft planning scheme. In assessment benchmarks where an acceptable solution is provided, the council should ensure that where an applicant meets the acceptable solution stated, that it is determined to also meet the SPP requirements. Acceptable solutions that do not incorporate the requirements of the SPP are not supported.</p>
184	DHLGPPW	<p>SPP – Part C – Purpose and guiding Principles:</p> <p>Section 13.1.4.4 of Integrating state interests in a planning scheme - Guidance for local governments</p>	<p>Part 5- Coastal Local Plans And Part 6.7 - Coastal Hazard Overlay Code</p>	<p><b><u>Coastal Hazard</u></b></p> <p><b>Issue:</b> <b>Provisions for Coastal hazard adaptation precincts do not adequately address the risk and limitations on development is not clearly described</b></p> <p>It is noted that Coastal Hazard Adaptation Precincts are areas identified within the draft planning Scheme as areas that are either being subject to a complex interaction of coastal hazards, or at imminent risk in a shorter planning horizon. It is also noted that further investigations are intended to be conducted by Council in Coastal Hazard Adaptation Precincts. The outcomes of these investigations will then inform future planning for these areas including consideration of appropriate zoning going forward depending on the specific adaptation strategy (e.g.; transition or mitigation).</p> <p>Provisions for Coastal hazard adaptation precincts within the Local Plans and Coastal Hazard Overlay Code (see PO14) of the draft Planning Scheme, as well as PO1(b)(ii) and PO2, Part 1: Coastal hazards generally, and PO8(f) of the Coastal Hazard Overlay Code, require development to be consistent with “Council endorsed site or precinct specific or locality wide coastal hazard, flood hazard and/or drainage mitigation or transition measures or strategies relevant to the site” (see PO43 in Part 11: Coastal hazard adaptation precincts of the Maroochydore Local Plan as an example). However, there is no evidence that these plans or strategies currently exist or will exist on commencement of the draft Planning Scheme.</p> <p>Council has not demonstrated that the risk has been adequately addressed in the current draft Planning Scheme. Further, implementation of these provisions without the necessary plans and strategies does not result in development outcomes that are certain, responsive and performance-based. The State does not support assessment benchmarks where limitations on development is not clearly described.</p> <p><b>Actions:</b> Council endorsed plans and strategies for Coastal hazard adaptation precincts should be included as a Planning Scheme Policy on commencement of the draft Planning Scheme and referenced within the relevant provisions.</p> <p>The council is to advise what is intended to occur in situations where the “Council endorsed plans and strategies for Coastal hazard adaptation precincts” are not in place? Will development not be supported? These provisions do not have a clear outcome, without the necessary plans in place.</p>
185	DHLGPPW	<p>SPP – Part C – Purpose and guiding Principles:</p> <p>Section 13.1.4.4 of Integrating state interests in a planning scheme - Guidance for local governments</p>	<p>Part 6.7 - Coastal Hazard Overlay Code</p>	<p><b><u>Coastal Hazards</u></b></p> <p><b>Issue:</b> <b>Coastal Hazards Overlay code does not clearly define when a site-specific coastal hazards risk assessment and/or mitigation report is required.</b></p> <p>PO1 of the Coastal Hazards Overlay Code includes a note which stipulates that “For some sites and/or development types, a site-specific coastal hazards risk assessment and/or mitigation report may be required. The <b>Planning Scheme Policy for the Coastal Hazards Overlay Code</b> includes guidance on the preparation of these reports”.</p> <p>The assessment benchmark does not make it clear for the applicant when a development application is required to include a site-specific coastal hazards risk assessment and/or mitigation report.</p> <p><b>Action:</b></p> <p>Amend the wording of PO1 within the Coastal Hazard Overlay Code to clearly define when an application is required to include a site-specific coastal hazards risk assessment and/or mitigation report.</p>
186	DHLGPPW	<p>SPP – Part C – Purpose and guiding Principles:</p> <p>Section 13.1.4.4 of Integrating</p>	<p>Part 6.7 - Coastal Hazard Overlay Code</p>	<p><b><u>Coastal Hazards</u></b></p> <p><b>Issue:</b> <b>Assessment benchmarks within the Coastal Hazards Overlay code are not robust enough to limit coastal protection work where there is no evidence of significant erosion, or there an immediate threat of significant erosion.</b></p>



Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
		state interests in a planning scheme - Guidance for local governments		<p>The SPP guidance for Integrating state interests in a planning scheme - Approach for plan drafting for Coastal Hazards – Consideration 25(1) requires assessment benchmarks to limit coastal protection work, except where:</p> <ul style="list-style-type: none"> <li>there is evidence of significant erosion, or there is an immediate threat of significant erosion.</li> <li>there is an inadequate erosion buffer zone and managed retreat is not possible</li> <li>infrastructure, structures or buildings are not able to be relocated and are in a condition that warrants protection</li> </ul> <p>Whilst AS8.1 limits coastal protection work as a last resort; the assessment benchmark is for development other than in accordance with acceptable solution AS7.1.</p> <p>AS7.1(b) requires development to install and maintain coastal protection works without evidence of significant erosion or an immediate threat of significant erosion.</p> <p>The State does not support assessment benchmarks which allow unnecessary costal protection works to occur</p> <p><b>Action:</b></p> <p>Amend the wording of assessment benchmarks within the Coastal Hazards Overlay code (in particular AS7.1), so as coastal protection works is limited only to circumstances where:</p> <ul style="list-style-type: none"> <li>there is evidence of significant erosion, or there is an immediate threat of significant erosion.</li> <li>there is an inadequate erosion buffer zone and managed retreat is not possible</li> <li>infrastructure, structures or buildings are not able to be relocated and are in a condition that warrants protection</li> </ul>
187	DHLGPPW	<p>SPP – Part C – Purpose and guiding Principles:</p> <p>hazard identification (policy 1) and risk assessment (policy 2) to develop planning scheme measures meeting the local circumstances (policies 4–6)</p> <p>Section 13.1.4.3 of Integrating state interests in a planning scheme - Guidance for local governments</p>	Schedule 2 – Mapping, Table SC2.6K, Map Number OM11(i)	<p><b><u>Landslide Hazards</u></b></p> <p><b>Issue:</b></p> <p><b>The fit-for purpose risk assessment for Landslide Hazards does not adequately incorporate climate change factors within landslide susceptibility considerations.</b></p> <p>The SPP guidance for Integrating state interests in a planning scheme - Landslide risk assessment – Step 1 – stipulates that climate change should be considered as part of a landslide risk assessment. It is further noted that the Australian Geomechanics Society's (AGS) Commentary on guideline for landslide susceptibility, hazard and risk zoning for land use planning (AGS 2007b) methodology does not consider climate change.</p> <p>A fit-for-purpose risk assessment for landslide hazard for the Sunshine Coast LGA included Commentary on Fit-for-Purpose Use of Landslide Hazard Maps and the Policy and Code for Development of Steep and Unstable Land, prepared by Core Consultants, dated 2 July 2021. The Core Consultants 2021 assessment concluded that the existing landslide hazard overlay mapping in the SCPS 2014 remains fit for ongoing use in a new Sunshine Coast Planning Scheme. However, the report also provided commentary on potential climate change impacts (such as flood data and ground water) which were not included as part of the risk assessment (see General Comments section in pages 6 and 7 of the Core Consultants 2021 report).</p> <p>It is noted that further data regarding flood, ground water and increased hazards due to climate change were included within the fit-for-purpose risk assessment for flood hazard for the Sunshine Coast LGA. For example, <i>The Multi-hazard Risk Assessment of the Sunshine Coast (BMT 2023)</i> included climate change factors (increased flooding and severe storm) and landslide hazard risk. The results of the analysis identified several suburbs that were vulnerable to landslides within different hazard scenarios.</p> <p>The above-mentioned flood, ground water and landslide hazard risk data does not appear to have been included within the fit-for-purpose risk assessment for landslide hazard for the Sunshine Coast LGA.</p> <p><b>Action:</b></p> <p>Amend fit-for-purpose risk assessment for landslide hazard for the Sunshine Coast LGA to include further assessment of climate change risks (such as flooding and ground water data) as identified within the fit-for-purpose risk assessment for flood hazard for the Sunshine Coast LGA. Where required, identified increased risks of landslides, because of the amended fit-for-purpose risk assessment, should be reflected within the overlay and/or zone mapping.</p>
188	DHLGPPW	Section 13.2.1 of Integrating state interests in a planning scheme - Guidance for local governments	<p>Schedule 1 – Definitions</p> <p>SC1.2 - Administrative terms</p> <p>Part 6.6 Bushfire Hazard Overlay Code</p> <p>Part 6.9 - Flood Overlay Code, and</p>	<p><b><u>Natural Hazards</u></b></p> <p><b>Issue:</b></p> <p><b>Administrative definition of vulnerable use within the draft Planning Scheme excludes short-term accommodation within an urban zone.</b></p> <p>Section 13.2.1 - Key terms and concepts of the SPP guidance for Integrating state interests in a planning scheme, explains vulnerable uses are inclusive of short-term accommodation. The SPP document states: <i>The occupants of non-permanent accommodation (such as nature-based tourism, resort complex, rooming accommodation, short-term accommodation and tourist park) are more vulnerable to the effects of bushfire attack because they are less familiar with their surroundings.</i></p> <p>It is noted that the administrative definition of vulnerable use within the draft Planning Scheme excludes short-term accommodation within an urban zone.</p>

Item	Department	State Interest/ Legislation	Planning Scheme reference	SIR comment and recommend action
			Part 6.12 - Landslide Hazard and Steep Land Overlay Code	<p>Whilst the draft Planning Scheme discourages short term accommodation from residential areas and the use is likely to be located in low hazard areas, natural hazards (including Bushfire hazard) is not excluded from urban areas. Whilst low, there may still be a risk that a vulnerable use (such as a <b><i>non-hosted holiday house</i></b> which is a form of short-term accommodation) is located within an urban area that is of risk of a natural hazard.</p> <p><b>Action:</b></p> <p>Provide justification for excluding short-term accommodation within an urban area, as a defined vulnerable use.</p>
189	DHLGPPW	<p>SPP – Part C – Purpose and Guiding principles – efficient</p> <p>Section 13.2.1 of Integrating state interests in a planning scheme - Guidance for local governments</p>	Part 6.6 Bushfire Hazard Overlay Code	<p><b><u>Natural Hazards</u></b></p> <p><b>Issue:</b> <b>The definition of “modification” of vegetation or areas of cultural significance is unclear</b></p> <p>The provisions of AS1.3 of the Bushfire Hazard Code states ‘No areas of native vegetation or cultural significance require <b>modification</b>’.</p> <p>The draft Planning Scheme does not provide any clarification (within a note or administrative definition) of what modification entails. Differing interpretations of modification can lead to confusion as to the amount of development that can occur. For example, AS1.3 does not make it clear if a branch can be pruned from a vegetation to allow for development, as this could be considered modifying native vegetation.</p> <p><b>Action:</b></p> <p>Provide further clarification within the draft Planning Scheme (via a note or an administrative definition) as to what the definition of modification entails.</p>