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Recognising and upholding excellence in local government

26 October 2026

Deputy Premier, Minister for State Development, Infrastructure and Planning and Minister for Industrial Relations

Email: planningforqueensland@dsdip.qld.gov.au;

ORGANISATION SUNSHINE COAST ASSOCIATION OF RESIDENTS INC. (OSCAR)

Submission on the Draft State Planning Policy 2026

26 October 2026

Deputy Premier, Minister for State Development, Infrastructure and Planning, and Minister for Industrial Relations

Email: planningforqueensland@dsdip.qld.gov.au

Dear Deputy Premier,

RE: SUBMISSION ON THE DRAFT STATE PLANNING POLICY 2026

The Sunshine Coast Association of Residents Inc. (OSCAR) is a non-partisan, not-for-profit peak group representing resident and community organisations across the Sunshine Coast and Noosa local government areas. Comprising 36 member groups spanning the region from Pumicestone Passage to Noosa and from the coast to the hinterland and ranges, OSCAR represents several thousand engaged residents who are deeply committed to protecting the environmental, cultural and social values of our region.

OSCAR welcomes aspects of the Draft State Planning Policy 2026 (draft SPP), including its emphasis on co-ordinating housing growth with infrastructure, supporting diverse and affordable housing, and providing planning certainty for emerging industries. OSCAR however cannot support the draft SPP in its present form. Important questions remain about climate change, natural-hazard risk, the transparency and consistency of assessment benchmarks, and changes to existing state-interest policies.

OSCAR asks the Queensland Government to address the issues raised in this submission. The comments are based on the draft SPP and the supporting material available to OSCAR at the time of writing.

OSCAR's overarching Vision states:

"The residents of this region enjoy being part of a connected and engaged community living in an area of outstanding natural beauty. They recognise that they are custodians of the unique and abundant biodiversity, beaches and green spaces of the region."

Executive summary and recommendations

OSCAR supports planning that enables appropriate housing, employment, infrastructure and economic activity while protecting the environment and the wellbeing of current and future communities. A clear state policy should help decision-makers resolve competing demands through transparent, evidence-based processes rather than leave material terms and safeguards uncertain. The SPP framework should also serve to reassure the community that important and relevant considerations are taken into account and reflected in the assessment processes and decisions.

OSCAR recommends that the Queensland Government:

1. Strengthen the draft SPP's strategic aspirations and guiding principles so they clearly reflect the Planning Act 2016 purpose of ecological sustainability, including the integration of environmental protection, economic development and community wellbeing.

2. Explain explicitly how climate change is to be considered across the SPP, to support an integrated, evidence-based approach that allows local governments to plan for local hazards contributing to safer, more prepared and resilient Queensland communities, and, inform assessment benchmarks.

3. Publish a comprehensive change register identifying existing state-interest policies and guiding principles that are retained, amended, deleted or relocated, with reasons for substantive changes and links to their new locations.

4. Provide authoritative definitions or reference clear guidance for material risk terminology, including acceptable, tolerable and intolerable risk; explain the role of community consultation; and retain effective natural-hazard risk-assessment requirements.

5. Ensure housing targets are informed by regional demand and a suitable mix of dwellings, and are coordinated with deliverable infrastructure, environmental constraints and natural-hazard risks.

6. Substantiate proposed amendments to current State policies including ecological and habitat connectivity, scenic amenity, water quality and hydrology, and clarify local and distributed renewable energy.

7. Demonstrate that amendments to assessment benchmarks are clear and evidence-based.

8. OSCAR asks the Government to explain the process by which changes to assessment benchmarks will be made, consulted on and applied to local planning schemes and particularly development applications already under assessment.

Ecological sustainability

The Planning Act 2016[1] establishes a planning system that facilitates ecological sustainability (refer to the text box below). OSCAR considers that the draft SPP should state more consistently how its aspirations and policies will deliver that statutory purpose.

> ***Purpose of Act[2]***
> *(1)The purpose of this Act is to establish an efficient, effective, transparent, integrated, coordinated, and accountable system of land use planning (**planning**), development assessment and related matters that facilitates the achievement of ecological sustainability.*
>
> *(2)**Ecological sustainability** is a balance that integrates—*
> *(a)the protection of ecological processes and natural systems at local, regional, State, and wider levels; and*
>
> *(b)economic development; and*
>
> *(c)the maintenance of the cultural, economic, physical and social wellbeing of people and communities.*

The draft SPP aligns with the Planning Act 2016 where it states on page 2 that "The SPP does not prioritise one state interest policy over another at a statewide level" and again on page 16 that "Plans and development outcomes should integrate and balance economic, environmental and social needs of current and future generations, and are consistent with the purpose of the Planning Act, to promote ecological sustainability". The draft SPP states however on page 13 that "local governments can use the strategic aspirations to shape their strategic frameworks and balance competing interests to ensure they continue to promote the State's long-term vision". This theme is repeated throughout the draft. In so doing, the draft SPP potentially subordinates public safety and long-term environmental resilience to shorter term economic and housing supply targets. This structural pivot may be seen to conflict with the statutory mandate set out in Section 5(2)(a)(i) of the Act, requiring ecological sustainability be advanced by "avoiding, remedying or mitigating the adverse effects of development on the natural environment."

OSCAR recommends that the strategic aspirations and guiding principles refer more consistently to delivering ecological sustainability.

Assessment benchmarks

Benchmarks are to be moved to the Planning Regulation 2017. The government states that "stakeholders advised that it would be an easier system for users of the planning framework if all assessment benchmarks of the State were combined in the Planning Regulation so that assessment managers and applicants only need to refer to one place"[3]. Local planning schemes may also contain relevant overlay codes and additional benchmarks, so all relevant criteria will not be found in a single document in any

1 https://www.legislation.qld.gov.au/view/html/inforce/current/act-2016-025

2 https://www.legislation.qld.gov.au/view/html/inforce/current/act-2016-025#sec.3

3 State Planning Policy 2017 Review The future of assessment benchmarks. August 2026. page 3.

event.

Moving benchmarks into the Regulation may also create uncertainty if the Regulation is amended while a development application is being assessed or if a change creates inconsistency with a local planning scheme. The supporting material should explain how such conflicts will be identified and resolved, how affected applications will be treated, and whether the State is responsible for approving planning schemes when assessment benchmarks change.

Importantly, and of concern, is that amendments to the Planning Regulation 2017 (and subsequent gazetted amendments currently in effect) are not subject to public consultation. This is unacceptable given the impact, implications and force of the Planning Regulations and its associated legislative frameworks.

Existing benchmarks are to transition as a 'like for like' version into the Planning Regulation, while some technical wording or references will be updated[4]. It appears however that some State interest policies have been substantively amended or even deleted from the current planning policy. The fate of any relevant benchmarks has not been disclosed.

OSCAR recommends that the Government publish a change register identifying for each current state interest policy, whether it is retained, amended, deleted; provide a link or reference to the provision that now addresses the policy, and give the reason for any substantive change.

Code-assessable development

The draft SPP (page 16) states "development ... consistent and in accordance with the broad intent of a zone and able to be assessed against assessment benchmarks, should be identified as code assessable development". OSCAR is concerned that this could be interpreted as supporting code assessment where a proposal does not fully conform with relevant planning-scheme performance outcomes or assessment benchmarks. To ensure development approvals are consistent with Local Government planning schemes, all assessments, where non-conformities are identified, should be returned to the relevant Local Government.

OSCAR does not support any expansion or relaxation of code assessable development assessment until it is clear that only such development that conforms entirely with relevant planning scheme performance outcomes and Planning Regulations is permitted to be code assessable.

Climate change

The State Planning Policy 2017 (SPP 2017)[5] purpose is to "recognise that mitigating and adapting to climate change is also an important consideration for planning at all levels. All state interests should be applied and considered in the context of a changing climate to support Queensland's people, economy and the environment". The Queensland State of the Environment Report 2024[6] states "Climate change is one of the most pressing challenges of our time, influencing weather patterns, ecosystems, and the natural processes that sustain life". The recent Commonwealth assessment report[7] states climates risks to Communities – urban, regional and remote are expected to increase from the current moderate level to

4 State Planning Policy 2017 Review The future of assessment benchmarks. August 2026. page 3.

5 https://cabinet.qld.gov.au/documents/2017/May/SPP/Attachments/Policy.pdf P.13

6 https://www.stateoftheenvironment.detsi.qld.gov.au/climate-change. Accessed October 17 2026.

7 Australia's National Climate Risk Assessment. 2025. Australian Climate Service. Page 6

very high by 2050.

OSCAR is concerned that climate change is no longer identified explicitly as a state interest or as a consideration guiding the state-interest policies in the draft SPP nor referenced or described in associated planning frameworks.

As written, climate change is or would be expected to be considered directly and indirectly within the current draft SPP through:

- Erosion prone areas are to be identified in accordance with Coastal Hazard Technical Guide, Department of Heritage Protection 2013
- State interest – Environment, heritage and efficient growth policy (f) relating to urban heat island effect
- references to future generations, future risk, future community needs, future needs, and
- The natural hazard assessment benchmarks review as part of the natural hazards policy review to align with the final revised SPP.

It remains unclear if climate change is in fact to be addressed in these areas.

OSCAR is concerned that coastal threats remain informed by the 2013 Coastal Hazard Technical Guideline.[8] This guideline sea level rise recommendation of 0.8m was derived from the Fourth Assessment Report of the IPCC. Dr Aysin Dedekorkut-Howes, Griffith University's program director of urban and environmental planning recently said that the State sea level rise "is quite old", with other climate risk models projecting a 1.5-metre to 2-metre sea level rise[9]. OSCAR is concerned that planning for significant and long term land use if based on this Guideline is not being informed by best available knowledge and does not objectively assess need.

OSCAR draws attention to the following significant changes affecting sea level rise projections that have occurred since 2013:

- The SPP 2017 holds that best available science is prepared by the IPCC[10]. There have been three IPCC reports reviewing sea level rise projections since 2013 and climate models have undergone two significant version upgrades.
- Critically, the Fourth and Fifth Assessment Reports assumed that in this century (a) no significant warming is to occur in Antarctica and (b) the planet will not experience a climate tipping point. The Sixth Assessment Report stated that it was highly likely that sea level rise projections have been underestimated as Antarctica is now one of the faster warming zones of the planet.

8 https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=2082&name=gl-cd-hazards-technical-guideline.pdf

9 Cited in: Gold Coast needs room to grow but climate risks could change where people live. By Dominic Cansdale, ABC News. Posted Wed 14 Oct 2026.

10 State Planning Policy 2017. page 73

- The IPCC Sixth Assessment Report also recommended the planning horizon for significant infrastructure be extended to 2150.
- Australia's National Climate Risk Assessment recommended a planning benchmark for sea level rise of 0.94m at 2090 from current mean sea level[11].

Clarity of Terminology

Terms such as 'acceptable', 'tolerable' and 'intolerable' risk are important to the application of natural-hazard policies, yet the draft does not clearly direct readers to authoritative definitions or explain how the terms are to be applied. Guidance should need to account for local context, but that does not remove the need for clarity about the decision-making process. Likewise, "appropriate" and "efficient" are so widely used OSCAR questions whether they have been used with their general meaning of "fit for purpose" in mind. If so, then there is excessive redundancy; if not then their meaning in the context of the draft SPP should be explained.

OSCAR recommends that the glossary or supporting guidance define these terms, identify the relevant authoritative material, and explain how risk assessments are to inform decisions. Where community risk tolerance is relevant, the process should explain how affected communities will be informed and consulted. OSCAR also recommends retaining an explicit requirement for fit-for-purpose natural-hazard risk assessment, unless the Government can demonstrate clearly how equivalent safeguards are secured elsewhere in the policy.

State interests

Not all State interests have been reviewed in detail. Comments are a result of key findings from a workshop of community members and largely represent local interests.

Housing, infrastructure and land use

OSCAR recognises the importance of increasing housing supply and supports the draft's emphasis on coordinating housing growth with infrastructure and enabling a diversity of housing. However, a target for one million new homes by 2044 should not be treated as a sufficient measure of success in itself. Planning must also consider where homes are needed, what types are required, whether they will be affordable and suitable, and whether they can be supported by infrastructure and services.

Housing needs vary between regions and over time. Relevant considerations include population and household trends, age and income profiles, migration, local employment, demand for rental accommodation and the needs of people seeking to downsize. OSCAR recommends that the policy emphasise evidence-based assessment of regional demand and a suitable mix of dwelling types rather than allowing a single numerical target to dominate local planning decisions.

Housing growth should be coordinated with infrastructure that is funded and realistically deliverable, including transport, water and sewerage, schools, health services and other essential facilities. If

11 Australia's National Climate Risk Assessment. 2025. Australian Climate Service. Page 26.

development proceeds ahead of infrastructure, residents may experience reduced amenity and governments may face additional costs to remedy shortfalls. The policy should make clear how infrastructure planning, funding responsibilities and delivery time-frames will be coordinated across levels of government.

Planning should also consider natural-hazard exposure and the long-term costs of locating homes in areas at risk. New housing in flood-prone or coastal hazard areas can create lasting risks for residents, property, insurers and public authorities. The policy should require that these risks be assessed using current evidence before land is committed to development.

OSCAR recommends that planning consider infill and gentle densification incorporating sustainable design principles where suitable and appropriate in consideration of, any proposed further greenfield expansion. Greenfield development can permanently remove land from other uses, including agriculture, conservation and other activities that contribute to the region's economy and quality of life. The Government should investigate economic and regulatory barriers that may make appropriate infill less attractive than greenfield development, and consider how those barriers can be addressed without compromising amenity, infrastructure capacity or environmental outcomes.

New housing should also respond to Queensland's climate. Design and urban form can influence heat, ventilation, shade, tree cover and demand for air-conditioning. Where the SPP is intended to address these outcomes, it should identify clear objectives and suitable assessment criteria rather than relying on general aspirations alone. The Sunshine Coast Design Principles are a clear and evidenced-based example of how densification can occur sustainably and contribute to liveability, affordability and wellbeing of residents and community.

Finally, the policy should recognise the need for smaller and shorter-term accommodation in locations where tourism, agriculture and other industries depend on workers who may be priced out of local rental markets. Regional housing strategies should consider the accommodation needs of local workers as well as permanent households and visitors.

OSCAR supports the stated objective that vibrant communities and growth be supported through coordinated and integrated infrastructure planning and delivery to meet current and future needs. The practical question is how governments will coordinate planning, funding, sequencing and delivery. OSCAR asks the Government to explain the arrangements by which State and local infrastructure responsibilities will be aligned with housing and employment growth, and how gaps between planned development and infrastructure delivery will be addressed.

<u>Economic land and tourism</u>

Land has economic, environmental, cultural and social value, whether used for agriculture, industry, tourism, conservation or other purposes. OSCAR recommends that planning decisions consider these values together and avoid treating undeveloped land as having no value until it is built upon.

Greenfield development may be appropriate in some circumstances, but it can permanently limit future land-use options. In areas where expansion would encroach on productive agricultural land, natural areas or important ecological connections, the policy should require careful consideration of alternatives and the long-term public interest. This reinforces the case for assessing suitable infill opportunities and the constraints that affect their delivery.

Tourism also depends on local conditions. A focus on increasing visitor numbers alone can overlook pressure on housing, infrastructure, natural areas and the amenity of residents. Local governments are often well placed to understand the particular attractions and pressures of their areas, while State support may be needed for infrastructure that exceeds local funding capacity.

OSCAR recommends that the SPP support sustainable tourism by protecting the environmental and scenic values on which tourism depends, recognising local circumstances, and coordinating infrastructure and worker-accommodation needs. Active transport connections can, for example, support access to attractions while benefiting residents and local businesses. The objective should be durable local benefits rather than growth in visitor numbers without regard to impacts.

Mining and extractive resources

Policy 2.d.

The coal seam gas development areas have experienced what appears a chaotic development of roads. The roads finally appear to largely meet load specifications years after the trucks had destroyed the rural network.

Recognising this, policy 2.d. should be amended as follows:

> d. avoiding new development on or adjacent to a transport route that will adversely affect the safe and efficient transportation of the extractive resource *and ensure transport routes meet engineering specifications for the development having regard to existing activitie*s.

Policy 4.

This policy as stated appears in conflict with the purpose of the Planning Act. Competing land uses are first to be assessed and competing ecological, economic and social objectives integrated in a balanced way. Prioritisaton of one land use should only occur after this process has been conducted.

OSCAR recommends Policy 4 be amended to:

> Prioritise opportunities for mutually beneficial co-existence between coal, minerals, petroleum and gas resource activities and other compatible land uses which do not compromise extraction of *approve*d resources.

Environment, heritage and efficient growth

In general, State interest - Environment, heritage and efficient growth includes most of the state interest policies from SPP 2017 – but not all. Policies have been deleted in their entirety, had components omitted and be conflated. As throughout the draft SPP, these omissions and ''merging'' have not been explained yet alone demonstrated that the changes are evidence based. OSCAR requests the Government explain the basis for such changes and how the revised policies will secure equivalent protection and outcomes.

Examples include:

- The SPP 2017 provision concerning the maintenance or enhancement of important cultural landscapes and areas of high scenic amenity, including important views and vistas[12], does not appear in the draft SPP 2026. This omission appears inconsistent with State interest – Tourism.

12 SPP 2017 State interest – liveable communities (3) (b)

- The logical and orderly expansion of urban areas[13] now omits an explicit reference to maintaining ecological processes and connectivity. OSCAR is concerned that ecological connectivity which is important to biodiversity and the ability of natural systems to respond to changing conditions is no longer a state interest.

The wording that promotes growth and development which 'protect coastal processes and coastal resources' is also unclear. OSCAR recommends clarifying how this outcome is to be achieved and identifying the controls or assessment criteria that will prevent unacceptable impacts on coastal processes and resources.

Natural hazards and safety

The SPP 2017 requires the avoidance of increasing exposure or the severity of the natural hazard. Risk is a function of likelihood (exposure) and consequence (severity). A change in either can increase risk and potential hazards and aligns with a formal risk approach. The proposed state interest policy 1. e. is concerned with an increase in both exposure and severity. OSCAR believes this policy should be amended to align with the common risk nomenclature.

High impact and hazardous activities

OSCAR believes that the focus on preventing emissions from exceeding standards should be at the plant rather than addressing the problem through liability after a major event has happened for example, underground coal gasification.

OSCAR recommends adding after 2.d. the following:

> ''Designing impact mitigation at source and ensuring emission standards are achieved at all times.''

Water

OSCAR recognises the importance of protecting catchments and water quality. However, several draft provisions rely on terms such as 'avoid or minimise adverse impacts', 'appropriately locating and designing' and 'protection or enhancement' without clearly identifying the relevant criteria or benchmarks.

The policy concerning the location of urban-zoned land refers to avoiding or minimising disturbance to natural drainage lines and landform features. OSCAR asks the Government to clarify how floodplains and their role in catchment and drainage systems are considered within this policy.

The draft's reference to 'reduced stormwater quality and hydrology'[14] is ambiguous. It is not clear whether the intention is to address reduced flows, deterioration in water quality, changes in hydrology generally, or some combination of these effects. OSCAR recommends clarifying the wording and explaining any departure from the existing SPP 2017 provision concerning altered stormwater quality and hydrology.

13 Draft SPP 2026 State interest – Environment, heritage and efficient growth 1. e.

14 Draft SPP 2026 State interest – Water 1. b.

Energy

OSCAR supports the objective of protecting communities, surrounding land uses and the natural and built environment from adverse impacts associated with the development, operation and decommissioning of major energy infrastructure. However, the term 'minimising' adverse impacts may be applied inconsistently unless supported by clear assessment criteria.

The draft also appears not to address expressly the development and supply of renewable energy at local, regional and individual scales. The draft also appears not to address expressly the development and supply of renewable energy at local, regional and individual scales. OSCAR recommends that:

- the Government consider restoring or updating the relevant 2017 policy direction to enable appropriately located small-scale and distributed renewable energy, while ensuring that environmental, community and other relevant impacts are properly assessed.
- support development of reliable *and efficient/fit for purpose* energy infrastructure (for example, major electricity infrastructure) including generation, storage, transmission and distribution, which leverage existing and planned resources, *renewable energy potential* and infrastructure networks, to enable connectivity and productivity.

Conclusion

OSCAR welcomes the draft SPP's attention to housing, infrastructure coordination and emerging industries. However, it cannot support the draft SPP in its present form while important questions remain about climate change, natural-hazard assessment, the meaning of risk terminology, the relocation and amendment of assessment benchmarks, and the treatment of existing state-interest provisions.

The SPP should clearly advance the purpose of the Planning Act 2016 and provide practical, transparent guidance for decision-makers. OSCAR asks the Government to strengthen the policy's references to ecological sustainability; review climate and hazard guidance against current evidence; clarify risk definitions and assessment requirements; explain how housing targets will be coordinated with regional needs and deliverable infrastructure; and publish a comprehensive register of changes to existing policies and benchmarks.

These changes would improve the clarity, transparency and practical value of the SPP while supporting development that is appropriate, resilient and consistent with the long-term interests of Queensland communities and ecological sustainability

Yours sincerely,

Melva E Hobson.

Melva Hobson PSM
President OSCAR

Organisation Sunshine Coast Association of Residents Inc.