

Attachment 1 – Officers Draft Submission on the Draft Queensland State Planning Policy 2026.

General comments Council supports the preparation of an updated State Planning Policy (SPP) that responds to contemporary land use and development challenges, promotes greater consistency across Queensland, and is easier to understand and apply. The <i>Planning Act 2016</i> seeks to achieve ecological sustainability by balancing environmental, economic and community outcomes. It is important that this balance continues to be reflected in the final SPP. Council notes that key aspects of the reform package remain under development, including natural hazards and resilience, transitional arrangements, and implementation support. These matters are critical to the successful implementation of the final SPP and to providing certainty for local government in preparing new or amending their planning schemes. The following comments are provided to assist the Queensland Government in refining the draft SPP and supporting implementation framework.

Theme and sub-topic	Officer commentary
Balancing strategic aspirations and state interests	- The draft SPP states that strategic aspirations, state interests and supporting policies are of equal importance and should be considered together. - Additional guidance is needed on the intended role of the strategic aspirations and how these priorities should be interpreted, balanced and applied in both plan-making and development assessment, particularly where aspirations or state interests compete. - In particular, none of the strategic aspirations expressly focus on environmental protection, despite environmental outcomes remaining a key state interest. This creates uncertainty about how environmental considerations will be balanced against aspirations focused on housing, economic growth, infrastructure and efficient urban development. - Further guidance on the role and weighting of the strategic aspirations would assist local governments in applying the framework consistently where competing outcomes need to be balanced.
Implementation of new SPP into draft planning schemes	- A significant issue for Council is the potential impact on preparation of the new Redlands Coast City Plan. - While the State Government has indicated that further implementation guidance will be provided, no timeframe has been identified. Early and clear advice would assist councils in minimising rework and reducing uncertainty during planning scheme preparation.

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Consideration of the SPP when not appropriately integrated into the planning scheme	• Further guidance is sought on the relationship between the SPP, planning schemes and development assessment where state interests have not been fully or appropriately integrated into a planning scheme. This is particularly relevant where a new SPP introduces materially different policy directions from those reflected in an existing planning scheme. • Practical implementation support through workshops, face to face meetings and written guidance from the State Government would be welcomed, particularly as the draft Redlands Coast City Plan progresses. • Further clarification is sought on how applicants are intended to determine whether and how the SPP has been integrated into a local planning scheme. It is understood that local governments will no longer be required to update the introductory sections of their planning schemes to confirm that the SPP has been appropriately integrated. This may create uncertainty regarding whether the State Planning Policy Interactive Mapping System (SPP IMS) applies.
<u>Environment</u> • <i>State interest Environment, heritage and efficient growth</i>	• Council has concerns regarding the integration of environment, heritage and efficient growth into a single state interest, particularly how environmental outcomes will be balanced against housing, infrastructure, economic development and growth objectives. • For example, the draft SPP identifies directing growth to areas with existing or planned infrastructure as a means of protecting natural areas and rural landscapes. While this is supported, it is not sufficiently explicit to ensure the protection of environmental values. • Environmental outcomes should have greater prominence within both the strategic aspirations and state interest framework to ensure environmental protection is clearly recognised, given appropriate weight and effectively balanced with development priorities. • Council is also concerned that the draft policy framework omits the important step of minimising impacts on matters of environmental significance. By relying only on "avoid" and "mitigate", the framework departs from the established impact hierarchy of avoid, minimise and mitigate. • The omission of "minimise" may weaken environmental outcomes and increase reliance on off-site mitigation measures rather than encouraging practical design responses that reduce the extent or intensity of impacts. Retaining a requirement to minimise impacts would support innovative and site-responsive solutions, particularly where complete avoidance is not feasible. • Council also seeks clarification regarding the revised policy position on koala habitat. The draft SPP refers to conserving koala habitat, whereas the current SPP seeks to conserve and enhance koala habitat extent and condition.

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	• Unless a change in policy direction is intended, Council recommends reinstating an explicit commitment to enhancing koala habitat extent and condition. • Biodiversity will continue to decline due to the impact of current cumulated damages and fragmentation allowed by regulation of stacked exemption categories in the Planning Act / Veg Management Act. SPP should seek to give further guidance to define and quantify what level of cumulative impacts will and will not be supported in the assessment of planning schemes.
<u>Heritage</u> • <i>Strategic Aspiration Promote efficient land use patterns outcome 5 – protect and maintain the extent and integrity of heritage, the environment, and natural and rural landscapes by limiting encroachment and incompatible uses and State interest Environment, heritage and efficient growth</i>	• The strategic aspiration seeks to "protect and maintain the extent and integrity of heritage". This wording may be interpreted as protecting only those places already listed on heritage registers, rather than supporting the identification and protection of additional places of cultural heritage significance. • To avoid ambiguity and support ongoing heritage conservation, Council recommends revising this outcome. • Council is also concerned that local heritage conservation has less prominence in the draft SPP than in the current policy framework. While local heritage remains recognised, it is incorporated within the broader Environment, Heritage and Efficient Growth state interest. Greater recognition of the importance of identifying, protecting and conserving local heritage would provide stronger direction for local governments. • In addition, heritage is not referenced within the "key interactions" sections of the state interests. If these interactions are used to assess whether planning schemes and decision making support the State's long-term vision, the absence of heritage may diminish its importance when balancing competing planning outcomes. • This may reduce the ability to demonstrate the significance of heritage outcomes when assessing development proposals.
<u>Water quality and storm water management</u> <i>State interest – Water</i>	• While the draft water state interest seeks to protect and enhance water quality and environmental values, these outcomes are not reflected within the identified key interactions. • As a result, it is unclear how water quality outcomes are intended to be considered and balanced against infrastructure, growth and economic objectives. • Council notes that stormwater management design, construction and post-construction objectives currently contained within Appendix 2 of the 2017 SPP are proposed to be relocated into subordinate legislation. • This raises concerns given one of the stated objectives of the reforms is to make assessment benchmarks easier to locate and apply. If these requirements are relocated, further clarification is required regarding: ○ where the provisions will be located;

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	○ how they will be referenced within the planning framework; and ○ the legislative mechanism that will provide effect to those requirements
<u>Strategic airport and helicopter sites</u> • <i>State interest – Transport, aviation and ports infrastructure</i>	• The final SPP should list the strategic airport and helicopter sites in a similar manner to Table 2 – Strategic airports in the existing SPP. The draft SPP currently states that the sites are identified in the SPP supporting information. However, it is unclear where the supporting information will be located in the revised SPP structure. The location of the supporting information needs to be clear.
<u>Transport</u>	<u>Integrated transport and land-use planning</u> • The final SPP should provide a stronger and more explicit policy basis for integrating land use and transport planning. Growth should be directed to locations that can be efficiently serviced by existing, planned and more importantly funded public transport, walking and cycle networks, with development intensity aligned with the accessibility and capacity of those networks. • Consideration should be given to providing clearer policy direction for: ○ Concentrating higher-density housing and employment in highly accessible locations. ○ Integration of development with existing and planned high-frequency public transport. ○ reducing unnecessary growth in locations that are difficult or disproportionately expensive to service. ○ provision of connected walking and cycling networks as part of new development. ○ improving access to employment, education and essential services by modes other than private vehicles and coordinating the sequencing of development with the delivery of transport infrastructure. • Greater clarity in these areas would strengthen the integration between housing, transport, infrastructure and efficient land use outcomes and support more coordinated and efficiently serviced growth. <u>Protection of future transport networks and corridors</u> • The SPP should provide clear direction for the protection of both existing and future transport corridors from development that could compromise their future function. • Protection should extend beyond currently committed infrastructure to corridors identified through regional plans, transport strategies and long-term network planning. This should include preserving opportunities for future upgrades, additional crossings, public transport infrastructure, active

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	transport connections and providing advice to Local Governments on how to address development proposal within the corridors. - Protecting these opportunities can avoid future development constraining strategic transport options and can be substantially more cost-effective than attempting to acquire or retrofit corridors after development has occurred. - This is particularly important in rapidly growing areas such as Southern Thornlands PDA where planning decisions made today can permanently constrain future transport network options. <u>Transport planning should not be limited to individual development impacts</u> - The SPP should reinforce the importance of considering cumulative transport impacts. Individual developments may have acceptable impacts when considered separately but when considered collectively can result in significant impacts on network capacity, accessibility or safety issues. - Strategic planning, through the SPP and regional plans should therefore consider the cumulative transport consequences of the development pattern and level of growth enabled by a planning scheme, rather than relying predominately on traffic impact assessment at the development assessment stage. - This would support earlier identification of transport infrastructure requirements and better coordinate between land use, development sequencing and transport network planning. <u>Proposed move from "avoid, then mitigate"</u> - Further consideration should be given to the proposed shift towards allowing development where natural hazard risks can be appropriately managed. While a risk-based approach provides flexibility, it should not unintentionally facilitate increased development intensity in locations reliant on vulnerable transport infrastructure or constrained evacuation routes. - Mitigation at the development-site level should not be considered sufficient where the broader transport network remains exposed to unacceptable risk. Residual network and evacuation risk should therefore form an explicit part of the test. <u>Alignment with transport strategies</u> - The SPP should explicitly recognise the role of local and regional transport strategies and long-term network plans in implementing state interests. - Where local governments have undertaken detailed integrated transport planning, there should be a clear pathway for that work to be reflected in the

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	SPP and inform planning schemes, infrastructure planning and development assessment without unnecessary duplication.
<u>Natural hazards</u> State Interest Natural hazards and safety assessment and benchmarks	- A key concern is that this state interest and its corresponding assessment benchmarks are still being developed. As the discussion paper indicates significant changes, including a shift towards an acceptable risk approach Council cannot provide meaningful feedback or support the proposed state interest or methodology. - The framework must provide clear direction outlining the appropriate balance between avoiding exposure and mitigating or managing risk and how to support a consistent approach across SE Queensland. - One of the key barriers for regional consistency is the cost and resources required to prepare, obtain and maintain hazard data. This is further complicated by the use of different methodologies across QLD and Australia which can result in inconsistencies in hazard data and mapping. - Greater State Government coordination is needed and where localised hazard investigation is needed appropriate funding and resources should be available to support Local Governments.
<u>Coastal environment</u> State interest's - Natural hazards and Tourism	- The draft SPP relocates the former coastal environment state interest into the revised natural hazards and safety and tourism state interests. This raises some concern that the importance of coastal environment matters may be less apparent, given they are no longer represented through a standalone state interest. Given a significant proportion of Queensland's population and settlements are located within coastal areas, and noting the increasing challenges associated with coastal hazards and erosion, it is important that the protection and management of the coastal environment continue to be afforded a strong and clearly identifiable role within the SPP. - The draft SPP retains the wording "temporary, readily relocatable or able to be abandoned development" in the Natural hazards and safety state interest, policy (3)(b)(i). Through development assessment, Council officers have experienced challenges in applying this provision in areas subject to coastal erosion and other coastal hazards, as it is often argued that a broad range of development types can satisfy the requirement of being readily relocatable or capable of abandonment. This issue may become increasingly prevalent with the growing use of modular construction and Modern Methods of Construction (MMC), which can further blur the distinction between permanent and temporary forms of development. For example, MMC development often enables buildings to be more readily relocated or removed. While these construction methods currently not prevalent in Queensland, it is uncertain when the SPP will next be reviewed and the prevalence of these construction methods may increase over time. As such, further refinement of this wording

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	may enable local governments to limit incompatible development from being located in these areas.
<u>Emerging industries</u> • <i>Strategic Aspiration Attract emerging industries and State interests – Economic land</i>	• Further guidance material is required to assist Local Governments identify and protect land for emerging industries. The draft SPP identifies a broad range of emerging industries that may have different requirements and land use impacts including biofuels, defence and mining technology. • This creates uncertainty for Local Governments to identify the amount, type or location of land that should be protected, especially where future industries may not yet be known. • Further guidance and clarification are needed to assist Local Governments appropriately plan for these uses and how to address this when drafting new planning schemes and how to prevent out-of-sequence or premature emerging industries that may create land use conflicts.
<u>Assessment benchmarks and the application of the SPP to development assessment</u>	• Further clarification is required regarding the relationship between integration of the state interests into a planning scheme and the proposed assessment benchmarks in the <i>Planning Regulation 2017</i>. The discussion paper states that Local Governments may integrate the new assessment benchmarks into their planning schemes but are not required to do so. Clarification should therefore be provided as to how a planning scheme will be determined to have appropriately integrated a state interest where the relevant assessment benchmarks have not been incorporated into the planning scheme. • As the assessment benchmarks are proposed to be transitioned to the <i>Planning Regulation 2017</i> and structured in similar way to Schedule 12A (Assessment benchmarks for reconfiguring a lot), further clarification is also sought on how the assessment benchmarks will be triggered and applied through the <i>Planning Regulation 2017</i>. • Further clarification is also required regarding the broader role of the SPP in development assessment. Supporting material indicates that the draft SPP is intended to have a greater focus on plan making and regional planning, particularly as the assessment benchmarks are to transition to the <i>Planning Regulation 2017</i>. However, Part B of the draft SPP indicates that the SPP will remain relevant to development assessment. Clarification is therefore sought on how the SPP is intended to operate in practice during development assessment, including whether it is primarily intended to be a matter considered for impact assessable development or whether it will have a broader role. • If the SPP is intended to have a broader role in development assessment, further clarification is sought regarding the application of the strategic aspirations. At present, they appear to perform a similar strategic function to

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	the state interest policies, and it would be helpful to better understand their distinct role in the assessment process.
<u>Maps to be integrated into a planning scheme</u>	• Appendix 1 Table A lists the maps that must be integrated into a planning scheme. In comparison to the 2017 SPP there are several maps that are not currently included including: ○ Natural hazards, risk and resilience – Bushfire prone areas, flood hazard area, erosion prone area and storm tide inundation area. ○ Transport noise corridors. • Page 11 of the draft SPP states that the SPP IMS prevails over maps listed in Appendix 1 Part F. However, these maps appear to provide the spatial representation of individual state interests. Further clarification is sought on the relationship between the SPP IMS and the maps listed in Part F, Appendix 1. • The draft SPP also states that SPP IMS statutory maps prevail over locally refined maps. Council supports consistent State mapping; however, Local Governments may have more current or detailed mapping that better reflects local conditions. Further clarification is sought on how locally refined or more current mapping will be considered where it differs from the SPP IMS, particularly where reliance on outdated mapping could affect development assessment or hazard risk outcomes.