



Draft Sunshine Coast Planning Scheme

HIA submission to the
Sunshine Coast Council





Contents page

About the Housing Industry Association	1
Introduction	2
ShapingSEQ 2023 Targets and Recent Building Activity	3
Recommendations.....	4
1. Identify and support new growth areas.....	4
2. Encourage small infill subdivision through minimum lot size reduction	6
3. Dwelling House (Small Lot) Code & Dwelling House Code	10
4. Dual Occupancy Code.....	11
5. Multi-Unit Residential Uses Code.....	12
6. Medium Density Residential Zone	13
7. Requirements for Flooding.....	15
8. Requirements for Bushfire.....	16
9. Coastal Hazard Overlay.....	17
10. Requirements for Electric Vehicles in conflict with the NCC.....	18



About the Housing Industry Association

The Housing Industry Association (HIA) is Australia's only national industry association representing the interests of the residential building industry.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. Our members are involved in delivering more than 170,000 new homes each year through the construction of new housing estates, detached homes, low & medium-density housing developments, apartment buildings and completing renovations on Australia's 10 million existing homes.

HIA members comprise a diverse mix of companies, including volume builders delivering thousands of new homes a year through to small and medium home builders delivering one or more custom built homes a year. From sole traders to multi-nationals, HIA members construct over 85 per cent of the nation's new building stock.

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into the manufacturing, supply and retail sectors.

Contributing over \$100 billion per annum and accounting for 5.8 per cent of Gross Domestic Product, the residential building industry employs over one million people, representing tens of thousands of small businesses and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry.

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis.



Introduction

Queensland is currently experiencing a profound housing crisis with declining affordability impacting all parts of the state. Coastal areas of South-East Queensland (SEQ) including the Sunshine Coast have been among the most severely affected.

The Sunshine Coast has witnessed a significant escalation in housing prices. Since 2020, the median house price has surged by an unprecedented 82%, reaching \$1.22 million. This figure now exceeds the median house price in all most every capital city⁽¹⁾. The crisis extends beyond the ownership market; the rental sector is also under severe pressure. The rental vacancy rate remains critically low at less than 1%, while the median weekly rent for a three-bedroom house has increased from \$480 to \$765 in the past 5 years⁽²⁾.

The social consequences of the rapid decline in housing affordability and availability are increasingly visible in our communities. Councils across SEQ are grappling with a growing number of people experiencing homelessness, with local authorities needing to intervene with individuals sleeping in cars and public parks on the Sunshine Coast. Moreton Bay City Council faces a similar situation, spending significant resources to demolish unlawful shelters and evict people from a local park before this action was halted the Supreme Court.

Despite these clear indicators of a severe housing crisis, acknowledged as a “supply” issue by both the State and Federal Governments, HIA is concerned that the proposed Sunshine Coast Planning Scheme fails to empower the industry to substantially increase housing options. HIA emphasises that due to the significant costs attached to constructing new apartments there is a pressing need to unlock new residential land and enable small-scale infill development which would allow the industry to construct more affordable Class 1a dwellings.

In HIA’s view the draft planning scheme provisions do not respond to the housing crisis being:

- Continuing a largely “business as usual” approach; or
- Enforcing greater restrictions on development through new or amended overlays; or
- Unlikely to facilitate additional housing as amendments to zoning and building height are out of touch with commercial reality, an issue identified by the Queensland Productivity Commission.

¹ PropTrack. (2025, August). *PropTrack Home Price Index*. <https://www.proptrack.com.au/home-price-index/>

² SQM Research. (2025, September 4). *Weekly Rents*. <https://sqmresearch.com.au/weekly-rents/>



HIA has provided several recommendations aimed at amending the planning scheme to improve the industry's ability to deliver more homes efficiently.

ShapingSEQ 2023 Targets and Recent Building Activity

The SEQ Regional Plan (*ShapingSEQ 2023*) sets a dwelling growth target which equates to 3,390 new dwellings each year for the Sunshine Coast. As this annual target is less than the average number of homes built over the past 5 years (average of 3,600 homes), HIA would contend that this target is clearly insufficient to meet the demand for housing.

Sunshine Coast Council		Number		
Year (ending June 30)		Houses	Other	Total
2024-25		1,875	1,319	3,194
2023-24		1,983	1,301	3,284
2022-23		2,407	1,018	3,425
2021-22		2,731	1,062	3,793
2020-21		3,110	1,268	4,378
2019-20		2,279	1,103	3,382
2018-19		2,710	1,396	4,106

Source: Profile ID – ABS Building Approvals

Figure 1: Historic building approvals on the Sunshine Coast

In relation to the targets for specific dwelling typologies, *ShapingSEQ 2023* seeks that 52% of new homes are detached houses and that 48% of new homes are attached dwellings.

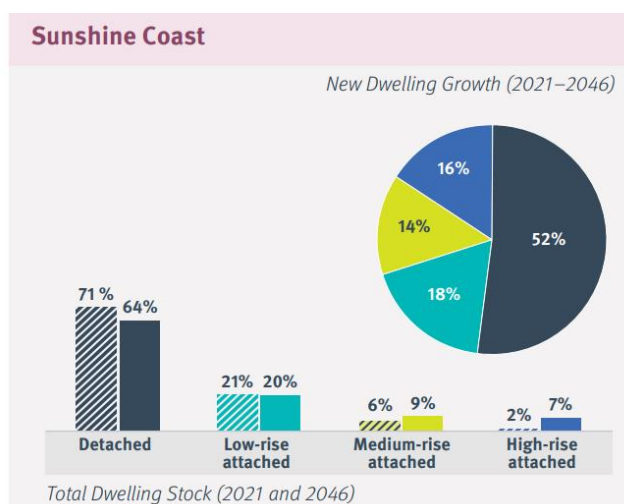


Figure 2: ShapingSEQ 2023 – Sunshine Coast Dwelling Targets

Recommendations

1. Identify and support new growth areas

In relation to dwelling houses, the *ShapingSEQ 2023* target equates to 1,760 new houses each year. Meeting this target for dwelling houses over the next 25 years undeniably requires a steady pipeline of new residential land.

There has already been a decline in the number of detached dwellings being constructed on the Sunshine Coast (see Figure 3) and according to the Queensland Government Statistician's Office (QGSO) there has also been a reduction in the number of new allotments being registered with last financial year reflecting a 41% decrease on the average of the previous five years ⁽³⁾.

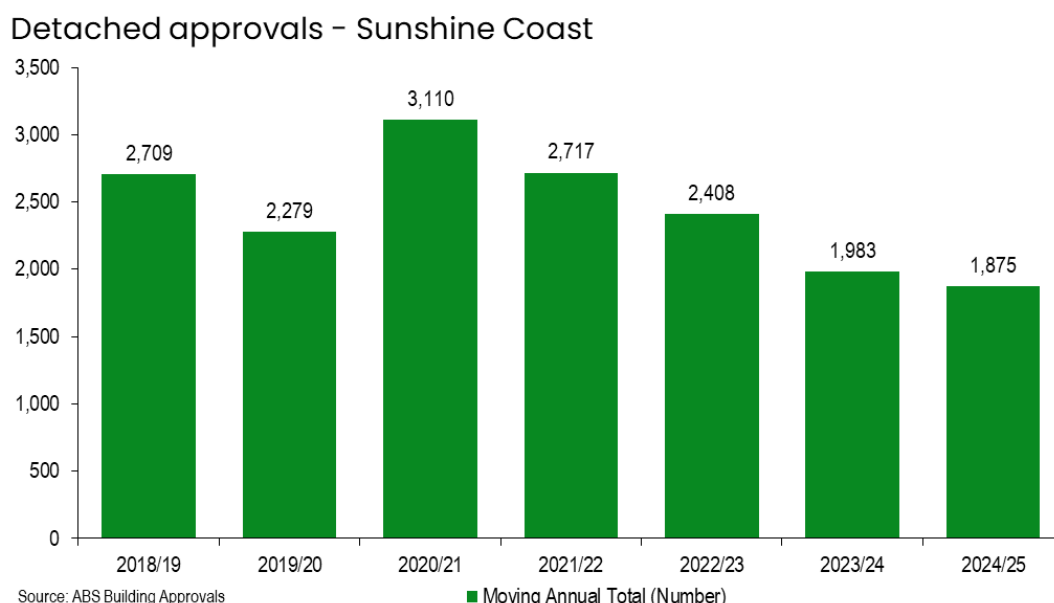


Figure 3: Sunshine Coast – Detached Dwelling Approvals

While a small portion of the Beerwah East Future Growth Area has been allocated to the Emerging Community Zone, there remains great uncertainty with the timely development of this area. The progression of Beerwah East appears to be stalled by unresolved native title claims, a long-term lease for a nationally significant timber resource, and on-going concerns about providing infrastructure and services to this location in a cost-effective manner.

³ QGSO. (n.d.). *Residential development*. Queensland Treasury. <https://www.qgso.qld.gov.au/statistics/theme/>

The existing greenfield communities of Caloundra South (Aura) and Palmview (Harmony) continue to deliver a significant portion of new housing on the Sunshine Coast. However, HIA understands that these communities are now reaching maturity and in the absence of Beerwah East there appears to be little consideration in the draft planning scheme to new growth areas.

The SEQ Regional Plan identifies Halls Creek as a Potential Future Growth Area which is being investigated for urban development. The draft planning scheme identifies Halls Creek within the Regional Inter-Urban Break.

Council's strategic framework mapping appears to conflict with Queensland Government mapping given Council's inter-urban break adjoins Bells Creek Arterial Road (see Figures 3 and 4).

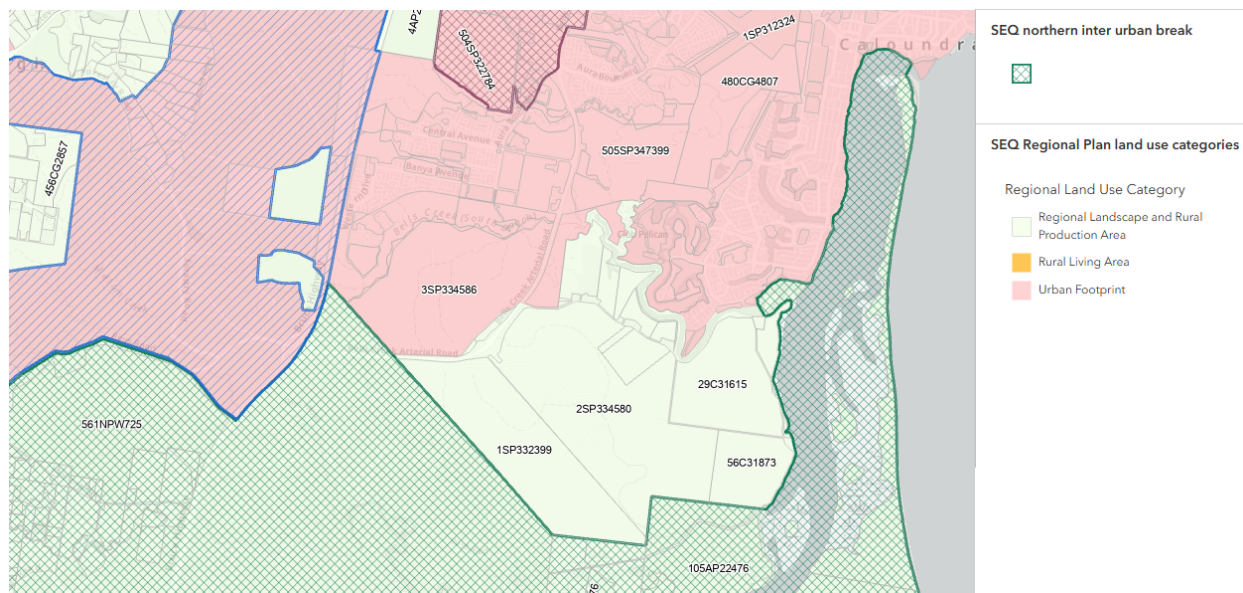


Figure 3: Queensland Government mapping of inter-urban break

HIA finds the Council's continued opposition to the Halls Creek Potential Future Growth Area concerning. This stance does not appear to be based on any verifiable evidence and is counterproductive to broader efforts to alleviate the current housing crisis. Halls Creek offers a clear solution, as a logical extension of the existing Caloundra South Priority Development Area (PDA). Crucially, this area can be efficiently connected to existing infrastructure, maximising the significant investments the Queensland Government has already made in this locality such as Bells Creek Arterial Road.

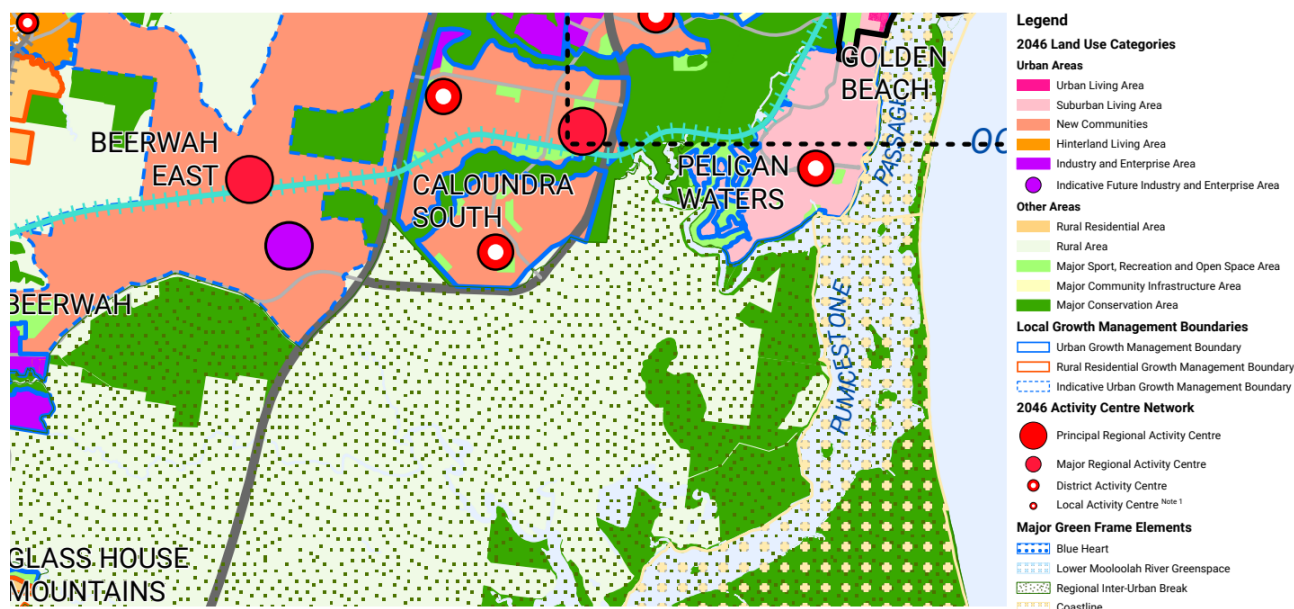


Figure 4: Council's strategic framework mapping (Map SFI)

Recommendation: Identify new growth areas on the Sunshine Coast including Halls Creek. Amend the mapping in the Strategic Framework (Map SFI) of the planning scheme to show the inter-urban break in a manner that is consistent with mapping provided in *ShapingSEQ 2023*.

2. Encourage small infill subdivision through minimum lot size reduction

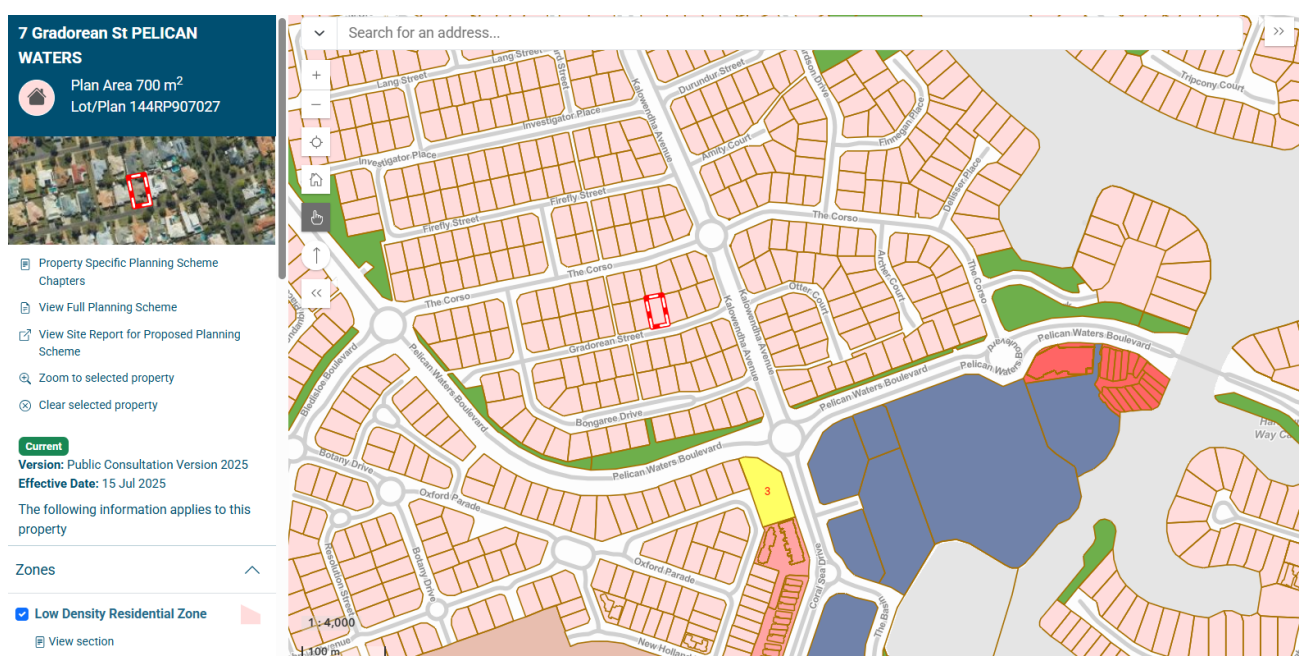
HIA supports decreasing minimum lot size requirements in planning schemes, as reducing the size of land is a proven method of reducing the overall cost of housing. However, the proposed minimum lot size in the Low Density Residential Zone which ranges from 450sqm to 800sqm fails to acknowledge that existing allotments are predominantly less than 700sqm in size, meaning the opportunity for subdivision is negligible.

HIA has completed some analysis of existing properties in various suburbs across the region. This shows that very few new development opportunities are facilitated by the minor reduction in lot sizes (see Figures 5 to 7, next page). Most concerning, most of these properties appear to be extremely well-located in terms of access to existing infrastructure and within walking distance of services and public transportation.

A commonly held apprehension to permitting smaller allotment sizes under planning schemes is that this will result in all properties within a street being subdivided. Ultimately, resulting in a density or character not envisaged in low density residential areas. This concern remains

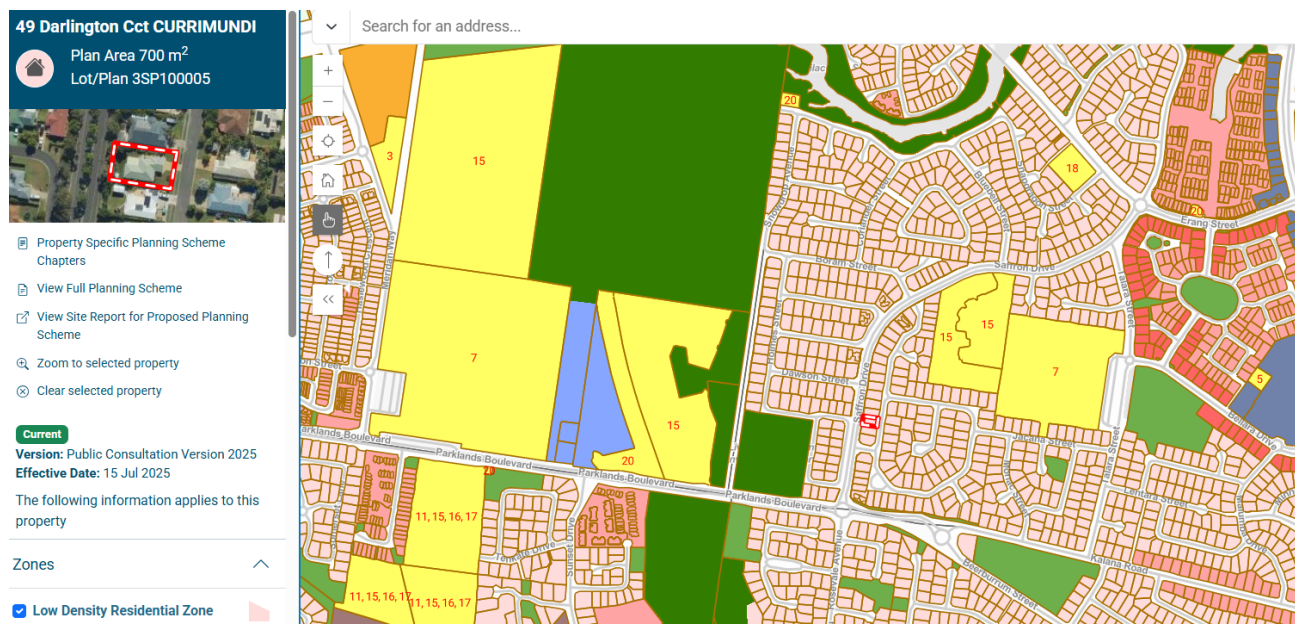
incorrect as there are many factors that determine if subdivision is a viable development outcome for a property including:

- Lawful point of discharge for stormwater – Council requires stormwater to be appropriately directed to the kerb and channel of the street or a stormwater system. As such, only properties that can achieve a topographical fall towards the street or connection to suitable infrastructure can be subdivided.
- Additional property constraints – Other planning scheme restrictions such as flooding and biodiversity can prevent subdivision or the construction of an additional house.
- Value of existing structures – In most circumstances where a property has existing structures or buildings of high construction value, subdivision is not economical as the creation of smaller lots requires partial or complete demolition.



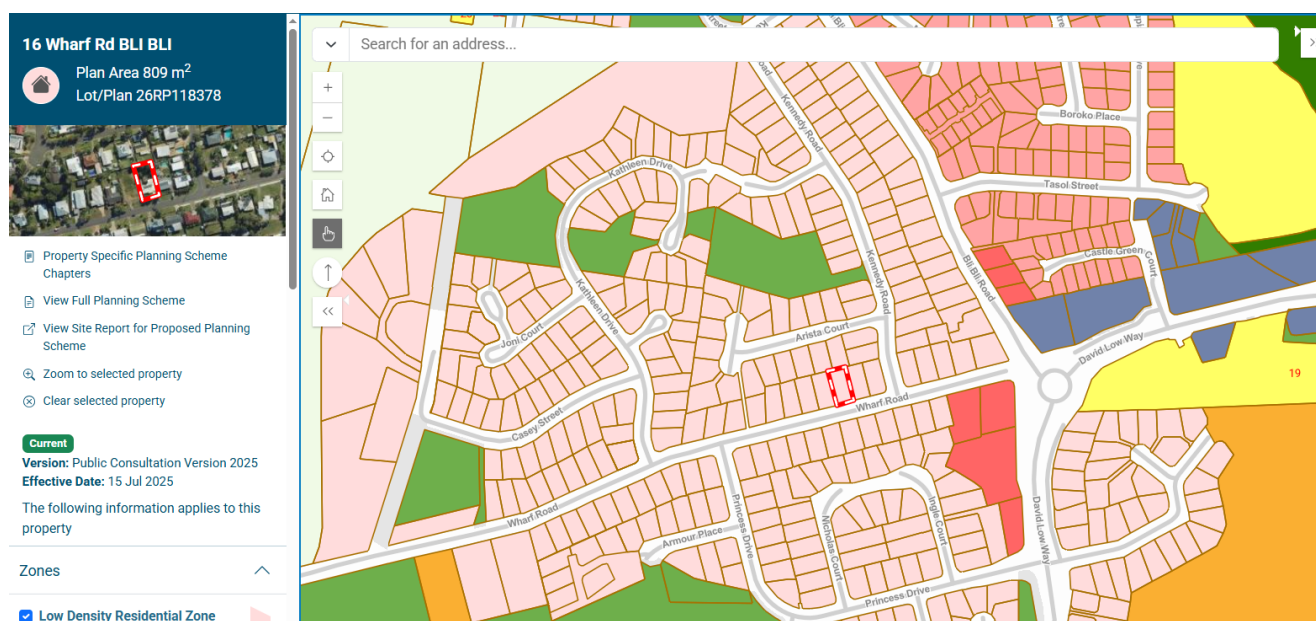
- Common block size is 750sqm or less within walking distance of District Centre
- Minimum lot size of 450sqm

Figure 5: Scenario Testing 1 – Parent Allotment Sizes – Pelican Waters



- Common block size is 700sqm within walking distance of services and centres
- Minimum lot size of 450sqm

Figure 6: Scenario Testing 2 – Parent Allotment Sizes – Currimundi



- Common block size is 800sqm within walking distance of centres
- Minimum lot size under scheme is 450sqm

Figure 7: Scenario Testing 1 – Parent Allotment Sizes – Bli Bli



Further to the above concerns, HIA questions the necessity of maintaining requirements that significantly increase the permitted minimum lot size for subdivision for properties with slope. The building industry has a long history of successfully constructing homes on sloping sites while preserving the natural landscape and visual amenity. This is often achieved by tiering retaining walls to limit visual impacts and by also ensuring a suitable level building pad is available for future homes.

The proposed approach of more than doubling minimum lot sizes in the Low Density Residential Zone appears excessive, especially considering the proposed Reconfiguring a Lot Code already contains several provisions to ensure suitable outcomes are achieved on sloping sites, regardless of lot size including:

- AS16.4 – Limits cut, fill, retaining structures, and other earthworks to maintain a site's natural topography in particular:
 - Restricts single-level changes or steps to a maximum of 1 metre in both vertical and horizontal dimensions;
 - Requires the crest of any cut or toe of any fill to be setback from the lot boundaries; and
 - Ensures a minimum rectangular dimension is kept clear of all retaining structures.

Table 8.5B Minimum lot sizes on steep land

Zone	Slope	Minimum lot size
Low-Medium Density Residential Zone	> 15% and ≤ 20%	500m ²
	> 20%	1,000m ²
<ul style="list-style-type: none"> • Low Density Residential Zone • Medium Density Residential Zone • High Density Residential Zone • Tourist Accommodation Zone 	> 15% and ≤ 20%	1,000m ²
	> 20%	1,500m ²
Centre zones	> 15%	1,000m ²
All other zones	No Change	

Figure 8: Minimum lot size increases for lots with slope

Recommendations: Consistent with the information request issued by the Queensland Government during the State Interest Review, reduce the minimum lot size in the Low Density Residential Zone to 300sqm with a minimum frontage of 7.5m.



Alternatively, the proposed minimum lot size of 450sqm will mean that no small lots are supported in the Low Density Residential Zone which is contrary to the SEQ Regional Plan's objective of increasing residential densities.

The provisions which substantially increase minimum lot size for properties with a slope should also be removed considering other provisions ensure the visual amenity and suitable response to natural topography.

3. Dwelling House (Small Lot) Code & Dwelling House Code

The proposed Dwelling House (Small Lot) Code results in approximately fifty-one (51) different requirements for accepted development. In an era where there is a clear need to reduce complexity and red tape, the level of complexity sought to be introduced for the design and siting of a detached house on a residential block of land is appalling.

There are several provisions in the draft code which will be problematic for certifiers and other building professionals to implement as detailed in Table 1 below.

Proposed Provision	Implementation Concern	HIA Feedback
R9.3 – At least 50% of the required private open area receives a minimum of two hours direct sunlight between 9am to 3pm in mid-winter (June, July and August).	Compliance with this provision appears to necessitate shadow/sun diagrams. This introduces additional plan drafting costs and requires a level of detail not commonly provided for smaller residential projects.	The proposed Dwelling House (Small Lot) Code also includes a maximum site cover provision of 50%. As such, a significant portion of each property is open to sunlight. R9.3 is therefore unnecessary.
R9.1 – A minimum of 20% of each site is provided as deep planted landscapes with at least one area within the setback to the primary frontage with a minimum area of 8sqm.	The definition of 'deep planted landscapes' appears to require certifiers to check that landscaping is installed prior to granting a final inspection certificate.	It is common practice for homeowners to exclude landscape works from building contracts. The need to install planting in allocated landscape areas to achieve this requirement could lead to delays on finance being released to builders and other



		complications for industry and homeowners.
R2.11 – varies rear boundary setback by 0.25m in the Emerging Community Zone based on lot depth.	This overly prescriptive approach to a rear boundary setback is unwarranted.	HIA fails to understand why the Emerging Community Zone requires a rear boundary setback different to any other residential areas.

Table 1: Dwelling House & Dwelling House (Small Lot) Code

Recommendation: The Department of Housing and Public Works has invested significant time and resources into creating an updated version of the Queensland Development Code (QDC MP1.1 and MP1.2), also known as the Queensland Housing Code.

The primary goal of the Queensland Housing Code is to introduce consistent design and siting requirements across the state. Many of the provisions proposed in the new planning scheme are already well-addressed by this code.

HIA recommends that the Council simply adopt the state-wide requirements for dwelling houses. This would help both the industry and homeowners better understand design requirements, rather than adding to the complexity of Queensland's planning framework by specifying 51 alternative provisions.

4. Dual Occupancy Code

While the new Dual Occupancy Code supports some additional opportunities for development on corner allotments in the Low Density Residential Zone, HIA is concerned about the significant increase to the minimum separation requirement between dual occupancies when not involving corner lots. The Code now mandates a minimum distance of 100 metres between dual occupancies on the same street, a major increase from the current policy which simply prevents dual occupancies on adjoining lots.

HIA questions the rationale behind enforcing greater restrictions when the Sunshine Coast is already facing a significant shortfall in achieving its attached dwelling targets under the regional plan. This new requirement seems to be at odds with the broader housing goals for the region and at 100 metres is clearly an arbitrary number with no logic or science behind it.

Recommendation: Consistent with our recommendations for subdivision, we believe dual occupancies should be supported on all lots in the Low Density Residential Zone with a



minimum size of 600sqm. This would create a maximum density of one dwelling per 300sqm of site area.

HIA questions why there is a misalignment between the density for dual occupancies (one dwelling per 300sqm) compared to subdivision (one dwelling per 450sqm) in this zone.

Council's current policy encourages dual occupancies, even though a similar density can be achieved through freehold subdivision. This is counterintuitive, as a dual occupancy involves common property, making them less desirable to the market than freehold lots. Aligning the minimum lot size requirements would support industry to deliver additional homes.

5. Multi-Unit Residential Uses Code

The apartment sector in Queensland currently faces significant commercial feasibility challenges, leading to a steady decline in the number of apartments constructed. The core problem is the increasing disparity between the increasing number of items that contribute to overall construction costs and potential sales prices, which makes most projects financially unviable.

New apartments are now largely limited to high-amenity coastal or inner-city suburbs where developers can achieve premium sales prices. This trend is confirmed by research from Urbis, which shows the average apartment sale price in Queensland exceeds \$19,000 per square metre as only large, high-end units are viable⁽⁴⁾.

The proposed Multi-Unit Residential Uses Code includes provisions restricting the size of apartments and enforcing a mix of bedrooms which is at complete odds with what the market wants and is prepared to pay for..

While HIA understands Council is aiming to promote affordability and diversity by requiring a mix of unit sizes, these provisions are unachievable for most projects. This conflict between well-intended regulations and the economic reality of construction creates a significant barrier to new projects commencing.

Recommendations: HIA recommends the removal of AS5.1 and AS5.2 to enable the market to provide the types of dwelling which are commercially viable. HIA would also suggest that Council work in consultation with industry to develop design provisions for Multiple Dwellings that reduce construction costs to support the delivery of more affordable units. Affordability

⁴ Urbis. (April 2025). *Urbis Apartment Essentials National 2024 Q4*. <https://urbis.com.au/insights-news/>



can not be achieve by enforcing significant boundary setbacks, building height transitions and excessive deep planting areas.

Acceptable solutions
<p>AS5.1</p> <p>Development for a multi-unit residential use involving 10 or more dwellings provides for:</p> <p>(a) a combination of at least 3 types, and a maximum of 60%, of any one of the following dwelling types:</p> <ul style="list-style-type: none">(i) studio;(ii) 1 bedroom;(iii) 2 bedroom;(iv) 3+ bedroom; and <p>(b) a minimum of 15% of all dwellings on the site to be equal to or less than 65m² in gross floor area.</p>
<p>AS5.2</p> <p>Development for a Class 2 multi-unit residential use involving less than 10 dwellings provides for:</p> <p>(a) a combination of at least 2 of the following dwelling types:</p> <ul style="list-style-type: none">(i) studio;(ii) 1 bedroom;(iii) 2 bedroom;(iv) 3+ bedroom; and <p>(b) a minimum of 2 dwellings on the site to be 2 bedrooms or less.</p>

Figure 9: AS5.1 – Requirement for variation in dwelling types and sizes

6. Medium Density Residential Zone

Market sounding to zoning and building heights

A significant disconnect exists between Queensland’s planning schemes and the commercial realities of property development. This issue was stressed by the Queensland Productivity Commission’s interim report, noting that upzoning and land releases need to reflect commercial realities and undergo market sounding.

In HIA’s view, this issue is apparent in the draft planning scheme through the Medium Density Residential Zone and the Building Heights Overlay. The Building Heights Overlay limits most of this zone to 3-4 storeys, which is misaligned with *ShapingSEQ 2023* target for 14% of new housing growth on the Sunshine Coast to be achieved via medium-rise housing (defined as 4-8 storeys).

Preliminary analysis completed by HIA of coastal locations in this zone reveals two major issues:

- Fragmented land – Allotments are highly fragmented, typically ranging from 500 sqm to 750 sqm in size; and
- High acquisition costs – A single allotment can cost between \$1.5 million to \$2 million.

These factors raise serious questions about the potential for new multiple dwellings in these locations. For example, acquiring a 1,000 sqm site for a townhouse development would cost around \$4 million, and HIA doubts whether building an estimated 7 to 9 townhouses in a three storey form would deliver a profitable outcome, for the builder/developer.

HIA's preliminary analysis suggest that council has not conducted adequate market feasibility analysis with developers when shaping their policies for zoning and building heights.

Rationale for zoning

The allocation of the Medium Density Residential Zone appears illogical as properties in the same street have different zones (see Figure 10 below). This inconsistent approach to zoning is made even more confusing by the fact that a consistent building height restriction is applied to these properties, despite their differing density classifications/zoning.

HIA suggests this lacks an alignment between the zoning objectives of the planning scheme and building height controls used to achieve specified densities. The fragmented and inconsistent zoning, combined with the uniform height restrictions, hinders the potential for new development to achieve higher densities.



Figure 10: Illogical Zoning



Recommendations: In relation to the Medium Density Residential Zone, HIA recommends the following:

- Increase maximum building heights to 6 to 8 storeys – This change would align with the definition of medium-rise under *ShapingSEQ 2023* and improve financial viability by allowing a greater number of dwellings per site; and
- Incentivise property amalgamation – Encourage the consolidation of smaller, fragmented allotments by incorporating a sliding scale for building heights based on site area. This would reward developers who combine properties, leading to larger, more efficient development sites and improved urban design outcomes. This approach has proven effective in other planning instruments and may help overcome the challenges posed by high land costs and small lot sizes.

7. Requirements for Flooding

The proposed planning scheme introduces a requirement for access to a dwelling to be flood-free during the 39% AEP flood event. This requirement appears to apply to most forms of residential development including:

- Building work for house extensions in certain categories of the Flood Overlay; and
- The construction of a secondary dwelling.

HIA is of that view that applying flood-free access requirements to smaller residential projects that do not involve a material intensification of a land use is unreasonable. It should be emphasised these properties, now being subject to strict planning scheme requirements will have severely diminished re-sale prospects.

It should be emphasised when the planning scheme applies this flood-free access requirement to building work it does not align with the Queensland Government's advice to local governments, '*Integrating Building Work in Planning Schemes*' and contravenes Section 8 (5) of the *Planning Act 2016* and Section 8 of the *Building Regulation 2021* which clearly specifies the matters that local planning instruments can specify for building work in flood hazard areas.

Recommendation: Flood-free access requirements should not apply to building work applications or small-scale residential developments as it is not possible for projects of this scale to resolve major issues associated with council roads being located below flood levels.



8. Requirements for Bushfire

The proposed Bushfire Overlay Code includes several provisions which place an unreasonable imposition on new development, particularly smaller residential projects.

It is noted that several provisions in the Bushfire Overlay Code do not align with State Government guidance such as *'Natural hazards, risk and resilience state interest – Bushfire'* and *'Integrating Building Work in Planning Schemes'*.

Proposed Provision	Implementation Concern	HIA Feedback
<p>R1.3 Development has an all-weather driveway from a constructed road with:</p> <p>(a) a minimum vertical clearance of 4.8m;</p> <p>(b) a minimum formed width of 3.5m; and</p> <p>(c) a surface load limit capable of accommodating a fire truck of 15 tonnes.</p>	<p>HIA notes that many properties located in the Bushfire Overlay are rural type allotments which can involve a private driveway extending hundreds of metres to reach a dwelling entry.</p>	<p>This provision to provide an 'all weather' engineered driveway will come at a significant cost to homeowners. Potentially resulting in driveways that are more expensive than proposed dwelling house renovations and extensions.</p> <p>The building approval process involves coordination with a Bushfire Expert to ensure that an appropriate bushfire attack level is provided to new buildings.</p>
<p>R1.4 (a) A driveway does not exceed a length of 60m from a constructed road. OR</p> <p>(b) Where a driveway from a constructed road is longer than 60m, it is designed to accommodate turning bays for firefighting appliance vehicles in accordance with Queensland Fire and Emergency Services, <i>Fire Hydrant and vehicle access guidelines for residential, commercial and industrial lots (2019)</i>.</p>	<p>As above, HIA is concerned that many rural properties involve driveways exceeding 60m from a public road.</p>	<p>It is emphasised that the QFES guidance referenced in R1.4 (b) does not apply to private driveways and is intended to provide guidance to developments involving the construction of a public road.</p>

Table 2: Bushfire Overlay Code – Unreasonable Driveway Provisions



Recommendation: Amend the Bushfire Overlay Code to remove unreasonable and costly driveway upgrades to dwelling houses. HIA would strongly recommend that Council should review Section 7 of the *Building Regulation 2021* which clearly specifies the matters that local planning instruments can specify for building work in bushfire prone areas.

9. Coastal Hazard Overlay

The proposed Coastal Hazard Overlay includes new sub-categories including Open Coast 2040 and 2100 areas. HIA understands that the Open Coast Erosion 2040 and 2100 areas relate to a coastal adaptation strategy.

The extent of this mapped overlay is significant, encumbering many residential properties from Shelley Beach to Coolum Beach. The provisions for this overlay in the Low Density Residential Zone prevent an increase in the number of people living in the hazard area or for a dwelling house prevents new secondary dwellings.

AS6.2

Development in the Low Density Residential Zone, within the open coast erosion to 2040 area or the open coast erosion to 2100 area, does not:

- (a) result in an increase in the number of people living, working or congregating in the hazard area; or
- (b) for a dwelling house, include a secondary dwelling.

Figure 11: Open Coast Erosion 2040 to 2100 area restrictions

This approach seems illogical and unfair as it disproportionately affects low density properties. All properties adjacent to the coastline, regardless of their zoning (e.g., medium or high-density), are exposed to the same coastal hazard risk. Therefore, restricting development solely in the low density residential zone appears to be an inequitable application of the policy.

Recommendations: HIA suggests the following:

- Review and justify proposed restrictions – Council should provide a clear rationale for why properties in the Low Density Residential Zone face stricter development restrictions compared to other zones, despite sharing the same level of risk from coastal erosion.
- Implement a consistent risk-based approach – The Coastal Hazard Overlay should apply consistent, risk-based provisions across all zones.



- Align with Regional Planning – The overlay's provisions should be re-evaluated to ensure they align with broader regional planning goals, which may include accommodating population growth in certain areas. Unjustified restrictions on development may conflict with these objectives.

HIA notes that any risks associated with climate change requires a coordinated approach at State and Commonwealth Government levels rather than individual councils implementing severe development restrictions in isolation.

10. Requirements for Electric Vehicles in conflict with the NCC

The proposed *Transport and Parking Planning Scheme Policy* specifies a requirement for Multiple Dwellings to incorporate electric vehicle (EV) charging infrastructure at a rate of 1 car parking space per 10 dwellings.

Land Use	Minimum on-site parking spaces with electric vehicle charging infrastructure
Residential activities	
Dwelling Unit	Sufficient spaces to accommodate demand anticipated to be generated by the development
Multiple Dwelling	1 space / 10 dwellings (where ≥ 10 dwellings proposed)
Relocatable home park	Sufficient spaces to accommodate demand anticipated to be generated by the development
Residential care facility	Sufficient spaces to accommodate demand anticipated to be generated by the development
Resort complex	1 space / 10 dwellings (where ≥ 10 dwellings proposed)
Retirement facility	Sufficient spaces to accommodate demand anticipated to be generated by the development
Rooming accommodation	Sufficient spaces to accommodate demand anticipated to be generated by the development
Short-term accommodation	1 space / 10 rooming units (where ≥ 10 rooming units proposed)
Tourist park	Sufficient spaces to accommodate demand anticipated to be generated by the development

Figure 12: *Electric vehicle charging infrastructure*

The Queensland Government has committed to the national *Trajectory for Low Energy Buildings*, which is being progressively implemented through the NCC. The NCC 2022 specifically addresses EV pre-provisioning for Class 2 buildings (apartment buildings), in particular all parking spaces must be ready for EV charging infrastructure.

Recommendations: Council should remove the specific EV charging and infrastructure requirements. These provisions are already regulated by the National Construction Code through an agreed national trajectory.