

# Submission on the Draft State Planning Policy 2026



**26 October 2026**

## Submission details

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| <b>Submission to</b>     | Deputy Premier, Minister for State Development, Infrastructure and Planning and Minister for Industrial Relations |
| <b>Submitted by</b>      | Independent Schools Queensland (ISQ)                                                                              |
| <b>Organisation type</b> | Peak body                                                                                                         |
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## About Queensland independent schools

Community confidence in the independent schooling sector remains strong, with more than 160,000 students enrolled in nearly 240 independent schools across Queensland. Independent schools educate approximately 18 per cent of the state's students.

Independent schools are valued institutions and an important part of Queensland's education system. They provide families with choice, support student learning and wellbeing, serve as community hubs, and contribute to employment and local economic activity.

ISQ is the peak body representing Queensland's independent schooling sector. ISQ represents the interests of member schools, fosters choice in education and protects the autonomy of independent schools. ISQ is a not-for-profit organisation and membership is voluntary.

## Executive summary

Independent Schools Queensland welcomes the opportunity to comment on the draft State Planning Policy 2026. ISQ supports the draft policy's emphasis on strong communities, responsive infrastructure and efficient land use. However, the policy should provide clearer and more explicit direction for the identification, protection and timely delivery of land for schools across the government, Catholic and independent sectors.

Queensland's projected population growth will generate substantial additional demand for school places. ISQ's Enrolment Demand Analysis, prepared by Urban Economics, projects that the state's school-age population will grow from 911,065 in 2026 to 1,049,033 in 2046 under the medium series, an increase of 137,968 children or 15.1 per cent. The same analysis projects demand for 76,111 additional independent school enrolments between 2026 and 2046 under the moderate participation scenario.

The planning system must ensure that residential growth is accompanied by adequate educational infrastructure. School sites require significant land, appropriate access, servicing and compatible surrounding uses. If appropriate sites are not identified and protected early, opportunities can be lost through fragmentation, incompatible development and escalating land costs.

# Response to stakeholder consultation questions

## 1. To what extent do you expect the proposed changes in the draft State Planning Policy to impact your organisation?

ISQ expects the proposed changes to have a moderate impact on the independent schooling sector. The draft SPP applies to local and regional plan-making and to the designation of premises for community-supporting infrastructure, including schools. Its treatment of infrastructure, land-use sequencing and growth planning will therefore shape whether independent schools can secure suitable sites and expand capacity in locations of current and future demand.

ISQ supports the draft Infrastructure state interest, which seeks coordinated and integrated infrastructure planning and delivery that meets current and future needs. In particular, policy 4 requires land for social and community infrastructure to be identified, protected and maintained by planning for projected demand and locating infrastructure in accessible, serviced areas. These provisions provide a sound basis, but should be clearer about schools and the need to plan across all three schooling sectors.

## 2. What changes, if any, would make the draft State Planning Policy easier for your organisation to implement?

### **Explicitly recognise schools in the infrastructure state interest**

The draft SPP refers to social and community infrastructure but does not expressly identify schools in the substantive Infrastructure state interest policies. Schools are mentioned elsewhere as an example of community-supporting infrastructure when premises are designated. This recognition should be carried through to the policy provisions that guide regional plans, local planning schemes and infrastructure planning.

**ISQ recommendation:** Revise Infrastructure policy 4 to expressly include schools and other education facilities within social and community infrastructure.

### **Require planning for all schooling sectors**

School infrastructure planning should consider projected demand across government, Catholic and independent schools. Queensland families use all three sectors, and growth planning that considers only one provider cannot fully respond to community needs or support educational choice.

**ISQ recommendation:** Require regional plans, local planning schemes, growth-area plans and relevant infrastructure plans to assess school-age population growth and identify suitable land to support school provision across government, Catholic and independent sectors.

## Strengthen early identification and protection of sites

Schools generally require large, consolidated and appropriately located sites. The most effective time to identify these sites is before residential development fragments land or establishes incompatible surrounding uses. The draft provisions should set a clearer expectation that land required for future schools is identified and protected early, with suitable access, servicing and safe movement networks.

**ISQ recommendation:** Clarify that planning for projected demand includes identifying a pipeline of appropriately sized, located and serviced school sites, protecting those sites from fragmentation and incompatible development, and sequencing delivery with residential growth.

## Provide a transparent evidence and review process

Population projections and enrolment patterns change over time. Planning schemes and infrastructure plans should therefore be informed by current demographic evidence and periodically reviewed against actual development and enrolment demand.

**ISQ recommendation:** Include an implementation expectation that school infrastructure needs assessments use current state and local population projections, consider school-age cohorts, and are reviewed at defined plan-review or growth-monitoring points.

## 3. What information, tools or guidance would help your organisation better understand or implement the proposed changes?

ISQ recommends practical implementation guidance that translates the policy intent into consistent regional and local planning practice. Guidance should include:

- a standard methodology for assessing school-age population growth and translating forecasts into indicative demand for school places and sites;
- criteria for suitable school sites, including indicative size, configuration, accessibility, servicing, transport integration, natural hazard exposure and compatibility with surrounding uses;
- guidance on planning across all three schooling sectors and engaging education providers early in growth-area planning;
- model planning-scheme provisions for identifying and protecting future education sites;
- guidance on infrastructure sequencing, land reservation and delivery responsibilities; and
- a monitoring framework linking dwelling delivery, population growth, school-age cohorts, enrolments, school capacity and site availability.

A spatial evidence base would also improve implementation. State and local planners should be able to compare population projections, planned dwelling growth, existing school locations, indicative capacity and future site requirements at regional and growth-area scales.

## 4. Do you have any other comments about the draft State Planning Policy?

ISQ supports the strategic aspirations to build housing and strong communities, deliver responsive infrastructure and promote efficient land-use patterns. These aspirations are directly relevant to school provision. New housing should be supported by well-planned and accessible schools, infrastructure should respond to changing demand, and compatible uses should be coordinated and sequenced.

ISQ also supports Infrastructure policy 1, which calls for the coordinated, timely and cost-effective delivery of planned infrastructure, including social and community infrastructure, to meet anticipated growth and community needs. Policies 3 and 4 are particularly important because they address protection of land for new infrastructure and planning for projected demand.

The concern is not the overall policy direction, but whether the current wording is sufficiently explicit to deliver consistent outcomes for schools. Without a direct reference to education infrastructure and cross-sector planning, implementation may vary between regions and local government areas.

## Evidence supporting ISQ's position

### Projected growth in the school-age population

The ISQ Enrolment Demand Analysis uses Queensland Government Statistician's Office school-age population projections. Under the medium series, Queensland's school-age population is projected to increase by 137,968 between 2026 and 2046, comprising 96,816 additional primary-aged children and 41,152 additional secondary-aged children.

The largest projected increases in school-age population are concentrated in Southeast Queensland:

- Ipswich: 42,491 additional school-age children, an increase of 55.7 per cent.
- Gold Coast: 25,914 additional school-age children, an increase of 23.2 per cent.
- Moreton Bay - North: 17,964 additional school-age children, an increase of 35.6 per cent.
- Logan - Beaudesert: 17,756 additional school-age children, an increase of 22.5 per cent.
- Sunshine Coast: 15,085 additional school-age children, an increase of 21.6 per cent.

### Projected independent-school demand

Under the report's moderate participation scenario and medium population series, demand for independent school enrolments is projected to increase by 16,791 between 2026 and 2031, 35,075 between 2026 and 2036, and 76,111 between 2026 and 2046.

The report states that the 2046 growth is equivalent to approximately six additional independent schools per year, assuming an average school size of about 600 students and where existing schools do not have sufficient expansion capacity. This is an indicative capacity equivalent, not a forecast that every additional place will be delivered through a new school.

### Existing capacity and land constraints

The report's survey of 38 independent schools found that 76 per cent of respondents were operating at or above capacity in primary year levels and 47 per cent were operating at or above capacity in secondary year levels. Of 35 respondents, 41 per cent indicated no future plans to expand enrolments.

Physical infrastructure and land availability were the most commonly identified constraints to expansion.

These findings indicate that future demand cannot be met solely through incremental expansion of existing schools. A planning response is required to preserve options for new schools and expanded campuses in locations where growth and demand warrant them.

## Conclusion

Queensland's growth requires coordinated planning not only for housing, transport and utilities, but also for schools. The draft SPP establishes a positive policy foundation through its strategic aspirations and Infrastructure state interest. ISQ recommends targeted amendments and implementation guidance to ensure those provisions lead to the early identification, protection, servicing and delivery of suitable school sites.

A clear cross-sector approach will help communities access local schooling, preserve parental choice and reduce the future cost and difficulty of retrofitting essential education infrastructure after residential development has occurred. ISQ welcomes continued engagement with the Queensland Government on the final policy and its implementation materials.

Regards,

Christopher Mountford



**Chief Executive Officer**  
Independent Schools Queensland

## References

*Urban Economics (2026), Enrolment Demand Analysis - Independent Schools Queensland, July 2026, prepared for Independent Schools Queensland.*