

20 September 2023

Via: [ShapingSEQSubmissions@dsdilgp.qld.gov.au](mailto:ShapingSEQSubmissions@dsdilgp.qld.gov.au)

Dear Review Project Team,

Thank you for the opportunity to comment on the 2023 Shaping SEQ Regional Plan Update (the SEQ Plan Update).

Please find attached our detailed submission.

We also attach separately two expert reports commissioned by us, and encourage the *ShapingSEQ* team to canvass both, as they contain valuable suggestions that both support some of the directions of the draft Plan, and additional considerations that could help strengthen it:

- Best Practice Regional Planning for SEQ, by SGS Economics & Planning ([here](#))
- Holding the Line: reversing biodiversity decline, by Shannon Mooney & Andrew Davidson ([here](#))

Finally we appreciate the enormity of this task and that there is some way to go before finalisation. In this respect we are keen to remain in contact with the Department and to provide ongoing input and support around engagement, particularly in relation to the Sustain theme, and working through related governance questions and the Measures that Matter, as we outline in our submission.

Yours in Conservation,



Dave Copeman

**Director**

Email: [director@qldconservation.org.au](mailto:director@qldconservation.org.au)

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QCC acknowledges that we meet and work on the land of the Jagera and Turrbal.

We wish to pay respect to all Elders — past, present and future — and acknowledge the important role all Aboriginal and Torres Strait Islander people play in protecting, conserving and sustaining Queensland's environment.

# 1. Introduction and recommendations

## About us

The QCC is Queensland's peak environmental advocacy group. We are a non-profit incorporated association with no political affiliations. Since 1969 our mission has been to protect the environment, wildlife and landscapes, conserve our precious natural resources and make Queensland governments, businesses and communities more sustainable.

The QCC represents 60 member groups with a combined membership representing more than 20,000 individuals. Our members consist of local, regional, state and national environment organisations located throughout Queensland. We achieve our goals by engaging with communities, advocating to governments and industry, and informing through the media. We apply scientific research to develop policies to achieve greater environmental outcomes.

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## Summary of Recommendations

### Sustain

- All areas with significant regional biodiversity values within the designated Development Areas, Urban Footprint and Rural Living Areas should be protected.
- Biodiversity corridors identified in the SEQ Plan should be designated as Matters of State Environmental Significance.
- A *whole of bioregion* bioregional mapping process should be completed for the SEQ Plan, and used to prioritise biodiversity protection and restoration in planning and land use decision making.
- Include targets to restore native vegetation cover to 40-50% of the region, over the longer term.
- Develop a comprehensive plan that includes all viable water supply options to ensure that SEQ urban water supply meets the needs of the region's future residents.
- Support the listing of the Moreton Bay area as a World Heritage Site and regulate the water quality impacts in a manner similar to the Great Barrier Reef.
- Include specific measures to better protect and enhance the quality of waterways across the region, including the requirement for local governments to develop and implement Total Water Cycle Management Plans and developer obligations on water quality.
- Ensure that all First Nations Peoples have an opportunity to be involved in the management and protection of their Countries and Cultures.
- Embed a precautionary approach to further development in already known areas of hazard, in anticipation of the Resilience Policy Maturity Framework being developed.

### Grow

- Set the targets for the proportion of growth to occur through consolidation higher and make them firm commitments.
- Undertake a more open and comprehensive evaluation of the previous Regional Plan.
- Commit to looking at potential suite of development contributions which could both provide funding for infrastructure, and incentivise (or disincentivise) the kinds of developments we need.

### Live

- Elevate any code or guide to achieve better design and planning outcomes, from mere guidance.
- Include landscape architects and ecologists, or other science based experts, in the creation of such guidelines and codes.

### Connect & SEQIS

- Clearly define 'Green and Blue infrastructure', and 'nature based solutions.'
- Green infrastructure should be afforded much greater status, planning consideration and investment.

### Prosper

- We support a range of recommendations outlined by SGS in the *Best Practice Regional Planning for SEQ* which contribute to economic development, such as poly-nucleated settlement patterns and clearly designating appropriate precincts as Freight and State Significant Industrial hubs.

### Other aspects of the Plan

- Strengthen the Governance framework through more diverse representation on decision making and reference bodies; and considering additional governance bodies to augment the existing ones, such as

a reference group to oversee the Measures that Matter, reconstituting the State Planning Reference Group, or establishing a new expert panel to oversee Sustain and interrelated measures.

- Task a body or agency to lead and proactively manage our regional biodiversity values and biodiversity corridors across themes and jurisdictions.
- Set clear targets for achieving Sustain outcomes, and measurements that reflect real world impacts.
- Look at amending the EDQ Act to broaden its purpose to include protection of biodiversity, water security and climate resilience.

### **Proposed Regulatory changes**

- More information is needed to properly respond to the regulatory amendments suggested to support the SEQRP.
- Where subdivisions and regulatory relaxing are proposed, we strongly recommend close consideration of the impact these changes will have on the availability of clearing exemptions, and regulatory amendments be passed which ensure clearing does not snowball under these regulatory changes.
- Greater protection of the Northern Inter-urban break is supported, with a recommendation that the values of all Inter-urban breaks be more fulsomely defined to better protect these areas.

## Introductory comments

We appreciate that both the current housing crisis and expected future population growth has necessitated an urgent update to the SEQ Plan. Moreover, this is no easy task, and there are complex factors at play. From a conservation perspective our region is now attempting to embrace ambitious levels and pace of development for SEQ, against the challenging backdrop of increased climate risk and volatility, including heading into a drier period of El Nino; consequent questions relating to essentials like water supply and security; and significant stressors on our surrounding ecosystems as development pressures intensify.

We welcome many aspects of the draft SEQ Plan Update, in particular the increased emphasis towards density, over urban sprawl. As noted in the *Best Practice Regional Planning for SEQ* report:

‘Our proposition is that quality medium density and infill development provides a faster, cheaper, lower risk supply solution which will better align with population needs, economic productivity and wellbeing. The continued expansion of the urban footprint of SEQ also poses a threat to productive agricultural land, as well as to critical wildlife habitats and biodiversity. Furthermore, lower access to employment opportunities and higher transport costs means that households in greenfield areas may suffer a cost of living - and economic access ‘disadvantage’ - compared to households in established areas.’

***SGS Economics and Planning***

We further welcome the ongoing inclusion, retention or strengthening of the following, and go into more details in our submission below:

- Koala Conservation Strategy, Bioregional Planning, cadastral boundaries for the Northern Inter-Urban Break (NIUB);
- incorporation of a Tree Canopy Target, principles for a circular economy and planning for an expanded recycling industry;
- aspiration to limit the expansion of the urban footprint, revised consolidation targets and focus on gentle “density” over urban sprawl;
- vision to have Moreton Bay World Heritage listed; and
- elevation of the recognition of Traditional Owners and commitment to work more closely with Aboriginal and Torres Strait Islander communities in ongoing planning and implementation.

We also recognise that Queensland urgently needs more housing, in particular social and affordable housing. But we also need to protect the homes of all Queenslanders. Right now, our iconic species like koalas, quolls, owls and greater gliders are suffering from increasingly fragmented and declining habitat. The South-East is one of the most productive and important regions for these species, that is why it's a globally renowned biodiversity hotspot. So we have to get the settings right, to set us up for flourishing communities and natural environments.

It's critical that this updated SEQ Plan builds not just houses and infrastructure, but resilient communities, and protects and restores our unique native wildlife and life-giving ecosystems for not just our own wellbeing, but that of future generations.

## 2. The Sustain theme

### Landscape wide habitat loss and fragmentation

The Department of Environment and Science's own biodiversity mapping reveals that 97% of South East Queensland's remnant forests have significant environmental values that must be preserved<sup>1</sup>. The *Holding the Line: reversing biodiversity decline* report has also shown that in some of the catchments, local government areas and sub-bioregions of SEQ, remnant vegetation is now below or close to 30% pre-clearing extent.<sup>2</sup>

Scientific evidence recommends that 30% of a landscape (at a minimum) at all scales from local to regional, needs to be conserved to ensure key ecosystem functions such as water and nutrient cycles can provide the services required by the environment, economy and society to survive and prosper.<sup>3</sup> For biodiversity and nature conservation to persist, a bare minimum of 30% needs to be met, but with preferably 40-50% required for healthy, functioning ecosystems. Analysis from *Holding the Line* also shows that an additional almost 6% of remnant vegetation in SEQ remains at risk from development. The lack of consistent and good practice planning processes, across the multiple jurisdictions over the last 20 years, has allowed our remnant vegetation and habitat to become very fragmented.

As such the decline in remnant vegetation, combined with the fragmentation, has placed the SEQ landscape at a precipitous tipping point. This is not only disastrous for our wildlife, but creates fragilities in our ecosystems across the landscape. If we were to lose another 5-6% we would significantly deepen the risk of regional extinctions to some of our most iconic species, and it may also begin to pose threats to liveability and human health as it erodes important ecosystem services. So whilst targets for canopy cover as a climate resilience strategy are supported and welcome, the SEQ Plan needs to go much further.

### Koala protections and the interplay of exemptions and offsets

We strongly welcome the full incorporation of the SEQ Koala Conservation Strategy 2020–2025 into the draft Plan.

SEQ's coastal lowlands are some of the most productive for koalas in the State, however they are also the areas where we have developed most intensively. Statewide Landcover and Trees Study (SLATS) clearing data for 2016-2022 still showed widespread impacts on core koala habitat with up to 3,446 ha experiencing some form of disturbance.<sup>4</sup> Researchers have suggested we are now at or reaching a perilous point where there is not currently enough longer term habitat for a healthy population of Koalas to persist regionally.<sup>5</sup>

A key reason for the ongoing loss and fragmentation of critical habitat is that despite the good intentions towards protection outlined in the 2017 Regional Plan, too many exemptions and exceptions have been created across our planning framework. This includes exemptions for state infrastructure, category X vegetation, Priority Development Areas and State Development Areas.

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<sup>1</sup> South East Queensland Biodiversity Planning Assessment (BPA).

<sup>2</sup> *Holding the Line: reversing biodiversity decline*, by Shannon Mooney & Andrew Davidson, p.3

<sup>3</sup> *Holding the line*, p.7

<sup>4</sup> *Holding the Line*, p 22.

<sup>5</sup> *Holding the Line* p.17, a view also expressed by Professor Frank Carrick (papers can be supplied upon request).

The Offsets system that also regulates clearing through an offsets framework is also not working as intended. In many cases it is priced too low, and habitat is not being replaced in a timely way, or able to in a like for like manner, or near to the areas in which it is removed.<sup>6</sup>

The cumulative impacts of these exemptions and offsets have perhaps not been properly considered and assessed fully to date.<sup>7</sup> And given the ongoing decline in habitat it is reasonable to assume that they are eclipsing the important stated conservation intentions of recent iterations of the SEQ Plans.

### **Regional Biodiversity values**

We support the ongoing inclusion of the Regional Biodiversity Network Map and Regional Biodiversity Values.

These values should be applied to the Urban Footprint, as it still contains significant biodiversity value and remains critical to the health of ecosystems regionally. We also recommend that the biodiversity corridors are designated as Matters of State Environmental Significance, to ensure that their values are effectively assessed and protected in any development approval process.

### **Bioregional planning & biodiversity protection**

We strongly support the incorporation into the draft SEQ Plan Update of the bioregional planning process as outlined by Ministers Scanlon and Plibersek on December 8 2022.<sup>8</sup>

A cumulative impact assessment of the environmental values of the SEQ bioregion, and the actions necessary to protect and restore such values to healthy levels to avoid further extinctions would be strongly supported. It would be both a significant shift from current practice, and what leading scientists indicate is necessary to act on a biodiversity crisis that is resulting in Australia leading the world in mammalian extinctions.

As part of the Nature Positive reforms, the Federal Government is considering adopting a spatial-based approach to regional planning under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act), involving the use of a “traffic light” spatial zoning system, where all land in a geographic region is zoned red, orange or green and specific regulatory requirements are attached to each zone.

We believe such bioregional planning should be guided by the following principles:

1. The rules are robust, evidence-based, scientifically defensible, and clear;
2. Areas that are identified as irreplaceable cannot be restored – hence they must occur in the Red Zone;
3. We follow the logic behind the Mitigation Hierarchy to ensure we first avoid, then minimize, then restore and finally offset (where things are offsetable) in order to reduce development impacts and control any negative effects on the environment;

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<sup>6</sup> See for instance issues outlined by Jonathon Rhodes on the the recent Griffith and University of Queensland study <https://theconversation.com/developers-arent-paying-enough-to-offset-impacts-on-koalas-and-other-endangered-species-208587>

<sup>7</sup> We note that the Koala Conservation Strategy Post Implementation Review (PIR) has had submissions before it outlining these concerns, and will be making an assessment of their impacts within the remit of the Koala work. We look forward to seeing what eventuates from this PIR.

<sup>8</sup> See: <https://statements.qld.gov.au/statements/96756>

4. In testing, we use the best available scientific knowledge collated by governments;
5. As we have imperfect data for some species (and some species are very clearly Data Deficient), we incorporate the precautionary principle and apply sensible area thresholds around potential impact for these species;
6. We recognise that development to support Australia's growing populations is inevitable, thus we incorporate rules that are pragmatic while ensuring protection and recovery of matters of state and national environmental significance.

Whilst the inclusion of the Bioregional Planning process in the the draft SEQ Plan Update is welcome, we are concerned that current Department of Environment and Science bioregional planning project for the SEQ bioregion involves limiting bioregional planning only to the (currently boundaryless) Priority Future Growth Areas (PFGAs), and modelling any impacts of development of these PFGAS across the IBRA subregions that they are contained within.

This modelling and mapping will be important tools for decision-making over the Priority Future Growth areas, but are not large enough in scope to set goals and determine values for the SEQ bioregion, or to allow for effective planning of all areas that should be either protected or restored across the whole of any of the 14 IBRA subregions in SEQ, or SEQ bioregion as a whole. We do not believe this is not in accordance with the ambition expressed by the two Environment Ministers in their release "*Bioregional plans will transform environmental protection in Queensland*"<sup>9</sup>

We would recommend in addition to the current DES project of developing bioregional planning, a *whole of bioregion* mapping process should be completed for the SEQ plan, and used to prioritise biodiversity protection and restoration in planning and land use decision making across the area of the SEQ plan. Such a wider approach would provide updated measurements of habitat restoration and protection that could be used to revise the Sustain Measures that Matter. It would be more consistent with the ambition expressed by Environment Minister Scanlon, and the proposed reforms of the EPBC Act by the Federal Government.

#### ***Suggested improvements:***

- All areas with significant regional biodiversity values within the designated Development Areas, Urban Footprint and Rural Living Areas should be protected to provide future greenspace/nature reserves and public open space for community health and wellbeing.<sup>10</sup>
- We recommend that SEQ's biodiversity corridors are designated as Matters of State Environmental Significance.
- We recommend in addition to the current DES project of developing bioregional planning for PFGAs, a *whole of bioregion* bioregional mapping process should be completed for the SEQ plan, and used to prioritise biodiversity protection and restoration in planning and land use decision making across the area of the SEQ plan.
- Targets should be considered, with an aim to restore vegetation and habitat to 40-50% of the region, over the longer term. This should be reflected in *Measures that Matter*. It could be integrated with Green Infrastructure and Climate Resilience strategies, delivering multiple and layered benefits.

<sup>9</sup> See: <https://statements.qld.gov.au/statements/96756>

<sup>10</sup> Recommendation of *Holding the Line*.



## Water

### Potable water supply security

Based on an estimated consumption rate of 200 litres per person per day, an additional 440 million litres of water will need to be provided per day to service the requirements of the extra 2.2 million people expected to live in SEQ by 2046. Moreover, in the short term, analysis by SEQwater shows the capacity of the SEQ Water Grid could fall to 50% by November 2024 due to the return of El Niño.

The draft 2023 draft SEQ Plan Update includes mention of increasing drinking water production of the Tugun desalination plant, upgrading the Northern Pipeline Interconnector (NPI), establishing water sensitive communities and providing \$25 million for water infrastructure for the Caboolture West development.

While QCC supports establishing water sensitive communities across the region, we do not support increasing the capacity of the NPI, increasing the Tugun desalination plants drinking water production and spending \$25 million on water infrastructure for Caboolture West without knowing any details regarding the potential costs and environmental impacts associated with these proposals.

### ***Suggested improvements:***

As the options mentioned in the draft SEQ Plan Update will not deliver the region's future potable water requirements alone:

- The government must immediately begin to develop a comprehensive plan that includes all viable water supply options to ensure that SEQ urban water supply meets the needs of the region's future residents. Including;
  - Reintroducing the requirement for rainwater tanks and water efficient fixtures/appliances to be installed in all new residential buildings,
  - Using the Western Corridor Recycled Water Scheme for its intended purpose of augmenting SEQ's potable water supply
  - Introducing wastewater recycling in other parts of SEQ,
  - Incorporating Water Sensitive Urban Design (WSUD) principles in all greenfield urban development and,
  - Reducing urban and commercial water demand.

### Moreton Bay world heritage

We strongly support the vision of nominating Moreton Bay as a World Heritage Listed area. We note the significant work being done to protect Great Barrier Reef water quality through catchment wide regulation of water pollutants and we strongly support similar initiatives being implemented in the south-east Queensland region to protect the unique environmental values of Moreton Bay.

One of the key impacts on the health of the Bay is urban development. This includes direct impacts from proposed developments into the Bay, such as Toondah Harbour. It also includes the significant and relatively underreported or studied impacts of urban development on waterways, and the increased quantities of nutrients, sediment and other pollutants into the Bay.

Particularly devastating examples of this impact occurred during the 2022 floods, where numerous pontoons and other riverside infrastructure was washed into the bay by floodwaters, resulting in significant amounts of polystyrene contaminating sea-grass beds essential for dugongs and other aquatic species.

### **Waterway quality**

Under the Sustain element of the 2017 SEQ Regional Plan, waterway quality is identified as a 'Measure that Matters' for comparing current trends to SEQ's preferred future under the Regional Plan.

From data provided in the 2018, 2019, 2020 and 2021 Measures that Matter Annual Reports, there has been a continual decline of waterway quality across the region since the annual reporting on the Measures that Matter commenced, which clearly shows that the various measures and initiatives that have been implemented to maintain waterway quality across the SEQ region are not sufficient to halt the ongoing decline of the region's waterways.

### ***Suggested improvements:***

As they are critical to underpinning the regions liveability and economy, it's absolutely essential to:

- Support the listing of the Moreton Bay area as a World Heritage Site and to protect this unique and biodiversity rich area, regulation of water quality impacts should be improved throughout the SEQ catchment area, as has occurred for the Great Barrier Reef
- Include specific measures in the 2023 update to the SEQ Plan to better protect and enhance the quality of waterways across the region
- Require local governments to develop and implement Total Water Cycle Management Plans (a reintroduction) and,
- Require Developers to avoid, minimise and mitigate (off set) any adverse impacts that occurs to water quality in fresh and marine receiving waters from their development.

### **Engagement with First Nations Peoples**

We support the Environmental Defenders Office (EDO) submission on this matter, as below:

The Update highlights the importance of First Nations Peoples in south-east Queensland and their connection to Country to enhance sustainable management of the region's cultural heritage landscapes. The Update aims to make sure Traditional Owners will be fully engaged and involved in cultural resource management decision-making processes and actions on and about land and sea Country. There is also a commitment in developing the final plan to engage with Traditional Owners and the broader First Nations community across south-east Queensland through a First Nations Engagement Framework.

The increased focus in the Update on the key role First Nations Peoples play in sustainable management of landscapes is an important improvement. However, such recognition must not be limited only to Traditional Owners that have a native title determination. Limiting engagement only to native title Prescribed Body Corporates (PBCs) can be exclusionary of other First Nations Peoples with a connection to Country that do not have a native title determination or who are otherwise not associated with a native title PBC.

While using native title party status to determine the appropriate First Nations Peoples to consult with provides greater certainty to proponents, it does not always ensure that all First Nations with a connection

to Country are consulted, and has led to division and dissent which has often been fostered and exploited by proponents.

- Ensure that all First Nations Peoples have an opportunity to be involved in the management and protection of their Countries and Cultures regardless of their native title status or association with a native title Prescribed Body Corporate.

## Climate Change

SEQ is already experiencing the volatility and impacts of our changing climate. The East Coast flood event in early 2022 (including SEQ) was the most costly Australian disaster of the 21st Century.<sup>11</sup>

Under the Sustain theme, the draft SEQ Plan Update has two Elements, 7 & 8 that attempt to address Climate adaptation, and Resilience. It also includes a Resilience Policy Maturity Framework for the first time. All of these are important inclusions which we support.

### ***Suggested improvements:***

- The Resilience Policy Maturity Framework is new and could take some time to develop and implement. Given the potential costs and consequences, the draft SEQ Plan Update should embed a precautionary approach to further development in already known areas of hazard.

## 3. Other themes

### **Grow Theme: welcome consolidation and housing diversity**

We welcome and support the emphasis in the SEQ Plan update to move to a more consolidated form of development and shift from a 60% - 40% to a 70% - 30% expansion/consolidation target over time.

However we note that this is only an “aspirational” aim. In addition 30% expansion is still likely to have too great an impact on remnant vegetation native forests. The target should be set much higher and be a firm commitment to avoid clearing any remnant forest.

The *Best Practice Regional Planning* report, highlighted the relative sufficiency of land supply for housing over coming years, and that it is much preferred to better utilise our existing urban footprint, rather than continue down a path of greenfields developments.<sup>12</sup> The *Best Practice Report* makes clear that Greenfields development is more expensive, slower and poses greater risk, including to ecological values.<sup>13</sup>

Whilst we are supportive of this intent, we also note that it is preferable that density focus on urban renewal and redevelopment of existing sites, as higher density still requires sensitively planned and integrated green spaces, and care needs to be taken that infill doesn’t exacerbate risks such as flooding.

The *Best Practice* report also notes that ‘development contributions are a common way for the community to benefit from the additional value generated by growth, through the levying of cash or in-kind

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<sup>11</sup> See: [Updated data shows 2022 flood was Australia's costliest - Insurance Council of Australia](#)

<sup>12</sup> *Best Practice Regional Planning for SEQ*, by SGS Economics & Planning, pp14-16.

<sup>13</sup> *Best Practice report*, pp11-12.

contributions on development proponents.’ For example, User pays charges, Impact mitigation payments, Value sharing requirements, and Inclusionary provisions.<sup>14</sup>

As part of the update, we suggest the potential suite of development contributions could be looked at more closely. Not only could reworking these contributions provide funding for infrastructure, they could also be shaped to incentivise (or dis-incentivise) the kinds of developments, and the pace of development that the draft SEQ Plan Update suggests we need. For instance to encourage good design, and discourage practices like land banking. So that existing available land is better utilised, and rent seeking behaviours, cost-shifting to the rate/tax-payer and other such perverse outcomes are minimised.

In regards to the Growth theme, the public consultation process would also have benefited from a publicly released evaluation of the 2017 SEQ Regional plan and discussion of learnings both from our recent history and overseas experiences of fast and significant growth.

***Suggested improvements:***

- Set higher targets for consolidation and make them firm commitments.
- Undertake a more open and comprehensive evaluation of our previous Regional Plan (such as housing typologies and development approaches to date), combined with evidence of what has worked elsewhere, to better understand what has worked, and what will deliver housing alongside a greater suite of economic, social and ecological outcomes.
- Incorporate a commitment to look at potential suite of development contributions which could both provide funding for infrastructure, and incentivise (or dis-incentivise) the kinds of developments we need.

**Live Theme: Good design for humans, habitat and climate**

We welcome the ongoing commitments to good design in the Live strategies and encourage the State to ensure best practice urban and landscape design is placed at the heart of the SEQ Plan implementation for all developments, be they private or public.

We can build up, rather than build out our communities with poorly serviced urban sprawl. However there are significant risks to community support for urban densification if it is not done well. And poor infill development and design further risks exposing our communities to more future harm from climate risks.

By ensuring developments have to follow best practice in design, we can re-wild and regenerate our urban areas, creating denser, yet more climate resilient neighbourhoods. We can have suburbs that simultaneously provide critical green space for human health and liveability, and homes for our precious wildlife.

***Suggested improvements:***

- Any code or guide designed for planning or developments needs to be elevated from simply mere guidance. We need to incorporate these elements much more strongly into the planning

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<sup>14</sup> Best Practice Report, from p.45.

framework in a manner that pragmatically drives the improved planning and design outcomes being sought by the SEQ Plan.

- Include landscape architects and ecologists, or similar scientific experts, in the creation of such guidelines and codes (such as the “density done well” series) to ensure they are robust and provide multiple interrelated benefits across design.

### **Connect Theme & the SEQ Infrastructure Supplement (SEQIS)**

Faced as we are with compounding and complex demographic and environmental challenges, and enormous cost implications in a fiscally tight environment, we need to develop and maintain infrastructure that provides benefits on multiple fronts.

In its current form the Connect Theme and SEQIS has a focus on built environment or hard infrastructure. ‘Green infrastructure’ for instance, is mentioned just once in the SEQIS and is not defined or expanded upon in either document. ‘Nature-based solutions’ are mentioned just once in Sustain strategy 7.5 of the draft SEQ Plan Update, and not at all in the SEQIS. As it stands it is a significantly missed opportunity, especially given the link and focus of the Olympics Games and its aims to leave a lasting legacy.<sup>15</sup>

Nature is often the best buffer, especially when dealing with great uncertainty. For instance it is essential to recognize that there is a limit to how much cement and steel can be used to ensure that infrastructure is adapted to all potential future climate change scenarios. Hence, integrating nature-based solutions into infrastructure planning is crucial. Trees have been used to slow down erosion and to reduce risk of disasters. These solutions become more robust over time and may include solutions such as planting mangrove trees to mitigate the impact of coastal natural hazard events and sea level rise.

We need infrastructure that supports resilient communities, including establishing and maintaining networks of green infrastructure. This was a shared conclusion of both the *Holding the Line*, and *Best Practice Regional Planning for SEQ* reports. These are critical to maintaining not just habitat, but the ecosystem services providing fresh water, liveability, food supply and climate buffers throughout our communities.

#### ***Suggested improvements:***

- ‘Green and Blue infrastructure’, and associated ‘nature based solutions’ should be more clearly defined and articulated in order to realise not just their benefits, but *necessity* in a changing climate and with challenging population growth entailing much greater density.
- Green infrastructure in particular, needs to be afforded much greater status, planning consideration and investment. Apply a strategic planning approach to integrate Green infrastructure (such as public reserves, terrestrial and waterway corridors, fauna crossings, trail networks) and nature-based solutions into the draft SEQ Plan Update and Infrastructure Supplement (SEQIS).<sup>16</sup>

### **Prosper Theme:**

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<sup>15</sup> With the Olympics commitment to being carbon positive and producing a legacy over a 10+10+ year period to drive economic, social and environmental outcomes: <https://www.qld.gov.au/about/brisbane2032/legacy-program>

<sup>16</sup> *Holding the Line*, recommendation.

The *Best Practice Regional Planning for SEQ* report makes it clear that “Queensland can generate a better economic dividend from the SEQ economy simply by managing the metropolitan settlement pattern”.

Better Planning, not new urban sprawl, is essential for our economic prosperity. The research is clear that we should establish and reinforce a poly-nucleated settlement pattern building on a hierarchy of centres, which supports efficient and equitable access to jobs, concentrates government investment and services, and capitalises on post-COVID trends towards working locally. Concentrated infill housing can then develop around and support these centres.

The clearest example of this is the impact of urban sprawl in increasing travel time, congestion and the resulting uncertainty about arrival times, that makes it difficult for people in new residential developments on the very edges of cities to access work. One clear example of this is barriers that face a parent of school age kids re-entering the workforce, when they have to allow for at least 30 minutes to travel not just to work, but to shops, schools, sporting clubs and other educational activities, health services. Once this travel time is factored in, it becomes clear how little time is left to engage in paid employment. It is a clear demonstration of the economic imperatives to create 20 minute communities with higher Effective Job Density. If we keep expanding out, the impacts on traffic and congestion alone will be a significant drain on productivity.

We strongly support the recommendations by SGS in *Best Practice Regional Planning for SEQ* to:

- Establish and reinforce a poly-nucleated settlement pattern building on a hierarchy of centres,
- Include clear plans for the protection and retention of existing industrial areas, including measures to limit the impacts of residential or other encroachment.
- Clearly designate appropriate precincts as Freight and State Significant Industrial hubs, and provide clarity on their role and significance (whether at the state or local level)
- Invest in city-shaping public transport infrastructure, that links key centres and future areas of growth across the region, to provide the focus for infill and renewal. New suburbs should be planned in conjunction with accompanying public transport – rather than embedding car dependence.
- Design future growth areas around the use of active travel options, aligned with investment in public and city-shaping infrastructure.
- Invest in initiatives to reduce transport-related greenhouse gas emissions, across all transport modes.
- Reinforce a clear transport network hierarchy, which prioritises access to freight, ports, airports and major industrial areas to support economic outcomes for the region.

## **4. Additional aspects of the SEQ Plan Update**

### **Implementation and governance**

We welcome and support the emphasis that has been placed on improving implementation and governance through a renewed implementation assurance and framework, and revised governance framework.

In terms of the governance framework, we suggest that greater diversity and representation in advisory and decision making bodies, where possible, would improve decision-making and the integration of outcomes from across the draft SEQ Plan Update thematic areas. In particular knowledge from the

conservation sector and scientific community would help ensure decisions are clearly science informed and preferably science based.

Alongside this, more consideration should be given to agencies or mechanisms for the State to proactively manage better outcomes at both a landscape and local level, across themes and jurisdictions. In particular in the critical work of protecting biodiversity values, corridors and restoring ecological systems and connectivity. This has shown to be incredibly difficult to achieve in part as there is a complex array of jurisdictions, tenures and land interests.

### **Measures that matter**

We support the need for the SEQ Plan Update to have a clear monitoring and evaluation framework to track progress.

The regional indicators in the 2017 Plan the '*Measures that Matter*' had varying degrees of efficacy, particularly when it came to the Sustain theme. Water quality was a reasonable indicator for that strategy. Whereas the mapped areas of Koala habitat or hectares in the Biodiversity network, were not particularly helpful in terms of reflecting impacts and what was actually happening with species on the ground.

Given the *Measures that Matter* will depend on final strategies, we would seek to be part of that work that is yet to be done, or to be involved in the consultation process around those, particularly in relation to the Sustain theme.

A reference or advisory group that monitors and works across these measures, could also be one way to improve governance and transparency around the measures and reporting. Such a reference or advisory group should be comprised of a wide range of stakeholders with relevant expertise, particularly with reference to science and conservation expertise, along with First Nations representatives.

We further note that significant improvements are needed still in how the Planning Unit consults with the community and conservation sector. Of particular note, EDO and the Queensland Conservation Council were invited this term of government to participate in the Planning System Reference Group with the Minister, and yet this meeting has not occurred for over a year – or at least has not occurred with an invitation extended to our organisations.

### ***Suggested improvements:***

- The Governance framework should include more diverse representation, including from First Nations and from the conservation sector and scientific community within existing bodies, so that decisions are clearly science informed and preferably science based.
- The Governance framework could also be strengthened, through additional mechanisms such as:
  - Adapting the The Housing Supply Expert Panel to become a Housing Supply and Biodiversity expert panel;
  - Establishing a reference group to oversee the Measures that Matter and guide progress, this should have diverse representation;
  - Reconstituting the State Planning Reference Group, with additional resources to ensure community and environmental concerns are adequately engaged in this process; and/or
  - Consider establishing a new expert panel to oversee Sustain and interrelated measures.

- Proactive management of our regional biodiversity values and biodiversity corridors needs an agency / body more clearly resourced and authorised to take the lead on managing outcomes across themes and jurisdictions. Options could include to:
  - Empower a body whose role is to “stitch together” the various planning schemes, and work across tenures;<sup>17</sup> or
  - Task such a role to an independent (Environmental Protection Agency) EPA, which the Queensland Government is still exploring; or
  - It could potentially be a role assigned as part of the Bioregional planning process, if it was done properly, at scale.
- Clearer targets should be set for achieving Sustain outcomes, and the measurements associated with them should reflect real world impacts.

## **The role of an active Government land developer**

The *Best Practice Regional Planning for SEQ* makes the case for ‘an active government land developer (EDQ) to intervene for orderly and efficient development and to demonstrate best practice infill housing and development.’ Whilst this is not an area within our usual remit, we acknowledge that there could be an increasing role for the State in being active in this area. Further, with the scale of the task ahead, the role of EDQ, or similar bodies, is probable to increase. In this regard we make the following suggestions.

### **Improvements to Economic Development Queensland Act**

Under s3, the main purpose of the Economic Development Act 2012 (the EDQ Act) is to “facilitate economic development, and development for community purposes, in the State”.

As South East Queensland’s (SEQ) liveability and much of its economy is underpinned by the region’s natural environmental assets, we strongly recommend that specific provisions are included in the EDQ Act similar to those included in the former Urban Land Development Act 2007 to ensure that SEQ’s beaches, waterways, forests and Moreton Bay are protected from development facilitated under the EDQ Act.

### ***Suggested improvements:***

- In order to protect SEQ’s natural environmental assets that underpin the regions liveability and economy, we recommend that the EDQ Act is amended to include provisions that:
  - Protect forests across the region;
  - Enhance water quality in fresh and marine receiving waters;
  - Maintain habitat connectivity;
  - Require urban development to meet sustainability criteria including water/energy efficiency standards and waste/emission reduction targets;
  - Integrate climate adaptation strategy recommendations and forecasts; and
  - Protect the biodiversity values of Queensland.

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<sup>17</sup> Such a body for instance, could look at the kind of strategy suggested in *Holding the Line* to ‘Develop a Regional Planning Scheme overlay map, stitching together all local government planning schemes and associated land use strategies to identify opportunities to collaborate and coordinate local land use intent to enhance regional nature conservation frameworks.’



## South East Queensland Natural Resource Management Plan

Under the 2017 SEQ Regional Plan, the targets contained in the South East Queensland Natural Resource Management Plan 2009 – 2031<sup>18</sup> (SEQ NRM Plan) are utilised to measure progress towards achieving various outcomes under the Sustain part of the 2017 version of the regional plan.

Despite being an integral part of the 2017 version of the regional plan, the draft 2023 update to the SEQ Regional Plan does not contain any reference to SEQ NRM Plan, which was updated in 2021 to ensure it aligns with the SEQ Regional Plan. Greater integration of tools such as the SEQ Natural Resource Management Plan into ShapingSEQ can provide ready-made mechanisms to support positive landscape change.

### ***Suggested improvements:***

- In the absence of any targets to measure progress towards achieving NRM related outcomes in the draft SEQ Regional Plan update, such as targets for restoration of habitat other than koala habitat, a positive step would be the incorporation of appropriate elements of SEQ NRM Plan 2021 in the finalised SEQ Regional Plan in order to be able to measure progress towards achieving NRM outcomes across the region.

## **5. Proposed Regulatory amendments**

We support the submission of the Environmental Defenders Office (EDO) in regards to the ShapingSEQ 2023 Update Regulation Amendment Consultation paper – July 2023. As per below.

### **Schedule 10, Part 15 Changes**

#### **Proposal 1 – Amendments to SEQ Development area provisions**

The Update has designated new Major Development Areas and proposes amendments to the regulation of these areas. The description of the amendments are not certain, for example where the rationale states that exemptions are to be removed but this isn't provided for in the proposed amendment. Major Development Areas provide for a track to approval which we understand removes assessment for areas or premises under 10,000m<sup>2</sup> in certain circumstances. We raise concern as to the potential for the increasing number of Major Development Areas to reduce regulatory and community oversight from developments which may be inappropriate.

#### **Proposal 2 – Renaming 'SEQ development areas and Major enterprise and industrial areas'**

This proposal is also unclear as to which industrial uses will be exempt from assessment and so it is not possible to understand the impact of the regulatory amendment proposed. A definition of 'industrial uses' which would be captured by this exemption is required.

### **Schedule 10, Part 16 Changes**

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<sup>18</sup>

[https://www.hlw.org.au/doclink/2021-update-nrm-plan/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJzdWUiOiIyMDIxLXVwZGF0ZS1ucm0tcGxhbGlzImhhdCI6MTY4MzI1NDk4NCwiZXhwIjoxNjgzMzQxMzQ0fQ.c\\_y9PlxfERzf7n4n8ki9TY9qBwLqTY7EJfqBj7-tKJQ](https://www.hlw.org.au/doclink/2021-update-nrm-plan/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJzdWUiOiIyMDIxLXVwZGF0ZS1ucm0tcGxhbGlzImhhdCI6MTY4MzI1NDk4NCwiZXhwIjoxNjgzMzQxMzQ0fQ.c_y9PlxfERzf7n4n8ki9TY9qBwLqTY7EJfqBj7-tKJQ)

### **Proposal 1 – Reconfiguring a lot in SEQ regional landscape and rural production area**

This proposed amendment appears to allow for subdivision of rural properties in the Rural Subdivision Precinct in certain circumstances, however with impact assessment required. While densification is encouraged to reduce urban sprawl, this must be done sensibly so as to also not threaten significant tree clearing. Subdivision of properties enlivens greater availability of exemptions which allow for clearing around certain buildings, meaning significantly more clearing can occur in subdivided areas than properties that are not subdivided.

We strongly recommend the exemptions allowing for clearing in these areas are reviewed to ensure the relaxation of this prohibition does not lead to a snowball of more clearing in the rural landscape. We support the provision of impact assessment for this proposed activity.

### **Proposal 3 – Residential care facilities are protected from natural hazards**

This proposal is supported to better protect residential care facilities from the impacts of natural hazards.

### **Proposal 8 – Northern Inter-urban breaks better protected**

This proposal is supported to better protect Inter-urban breaks from incompatible land uses and impacts. We strongly support more fulsome definition of the values of the Inter-urban breaks being provided for though, to ensure they are appropriately protected under these regulations.

### **Recommendations:**

- More information is needed to properly respond to the regulatory amendments suggested to support the SEQRP.
- Where subdivisions and regulatory relaxing are proposed, we strongly recommend close consideration of the impact these changes will have on the availability of clearing exemptions, and regulatory amendments be passed which ensure clearing does not snowball under these regulatory changes.
- Greater protection of the Northern Inter-Urban break is supported, with a recommendation that the values of all Inter-urban breaks be more fulsomely defined to better protect these important environmental areas.

## **6. Recommendations - Holding the Line: reversing biodiversity decline report**

**To improve the ShapingSEQ Plan and safeguard a healthy, thriving region, we make the following recommendations:**

- Consolidate and buffer existing remnant vegetation, biodiversity and koala habitat to ensure connectivity and ecological function is maintained.
- Focus ecological restoration in recovering forested areas in the right parts of the landscape including riparian and along waterways, connecting forests, along coastlines and on hillslopes.
- Investigate future biodiversity opportunities within the ShapingSEQ Subregion planning areas. This could include revisiting the Queensland Greenspace Strategy 2011-2020 and lands available for community greenspace and other multiple benefits.
- Apply a strategic planning approach to integrate 'Green' infrastructure (public reserves, terrestrial and waterway corridors, fauna crossings, trail networks) into the state government infrastructure supplement ShapingSEQ.
- Greater integration of tools such as the SEQ Natural Resource Management Plan into ShapingSEQ can provide ready-made mechanisms to support positive landscape change.
- Develop a Regional Planning Scheme overlay map, stitching together all local government planning schemes and associated land use strategies to identify opportunities to collaborate and coordinate local land use intent to enhance regional nature conservation frameworks.
- All mapped biodiversity significant areas within the designated Development Areas, Urban Footprint and Rural Living Areas should be protected to provide future greenspace/nature reserves and public open space for community health and wellbeing.

## **7. Conclusions - Best Practice Regional Planning for SEQ report**

### **1. An alternative to sprawl for SEQ**

The basic necessity of housing has become unaffordable for an increasing share of SEQ's households and residents. Multiple factors not related to planning have contributed to this. Nevertheless, planning plays a role in ensuring capacity for future housing. However, for SEQ, continued outward urban expansion to provide future housing is not tenable nor sustainable. A much greater focus on infill development and pathways to achieve this need to be demonstrated in the SEQ Plan.

Medium density and infill development provides a faster, cheaper, lower risk supply solution which will better align with population needs, economic productivity and wellbeing than further greenfield development. The continued expansion of the urban footprint of SEQ also poses a significant threat to productive agricultural land, as well as to critical wildlife habitats and biodiversity.

### **2. Five pillars of good planning**

Effective strategic planning is foundational to future housing supply, within its principal role of creating liveable, sustainable and productive communities. Where future housing is located, what type of housing it is, the availability of amenities and services and accessibility to employment opportunities are critical to sustainable and enduring solutions. The five pillars of good planning, as they have been described here, will be key to achieving a compact city in SEQ:

#### **1. Settlement respecting the landscape**

- Plan with Country, involving First Nations peoples
- Clearly identify a growth boundary and areas which will not be allowed to develop in future
- Establish and maintain networks of green infrastructure

#### **2. Strong economic and employment clusters**

- Establish and reinforce a poly-nucleated settlement pattern building on a hierarchy of centres
- Include clear plans for the protection and retention of existing industrial areas
- Clearly designate appropriate precincts as Freight and State Significant Industrial hubs

#### **3. Transport in support of connected and compact cities**

- Invest in city-shaping public transport infrastructure
- Design future growth areas around the use of active travel options
- Invest in initiatives to reduce transport-related greenhouse gas emissions
- Reinforce a clear transport network hierarchy

#### **4. Housing choice, affordability and sustainable neighbourhoods**

- Plan for housing capacity
- Plan for liveability and sustainability
- Plan for urban form and density.

#### **5. Infrastructure that supports resilient communities**

- Identify and address existing gaps in community infrastructure provision
- Include effective mechanisms to deliver required infrastructure
- Reduce sprawl and urban expansion at the outskirts

Alongside the five pillars, concerted attention and investment needs to be given to implementation, including through a suite of development contributions to provide funding for infrastructure, fit for purpose governance arrangements (including a metropolitan perspective), and an active government land developer in EDQ.