

1. Introduction

This submission has been prepared by the Southeast Queensland Community Alliance (SEQCA), a not-for-profit umbrella organisation formed by planning and environmental advocacy groups based across SEQ. SEQCA has reviewed the draft SEQ Regional Plan 2023 Update (draft Update) and accompanying materials. In line with our mission (see Appendix 1), we have focussed our attention on the GROW, SUSTAIN and LIVE themes.

2. General observations and key recommendations

We note the draft Update assumes higher population growth rates than the pre-COVID trend (at 31). We request the Department publish their predictions – and methodology for calculating them – for growth in each suburb in five yearly intervals across the life of the regional plan.

We acknowledge that, should the forecast growth eventuate, the SEQ region will require more dwellings to satisfy demand. However, **we caution against silo thinking – that is, viewing the so-called housing “crisis” in isolation to multiple crises that are simultaneously unfolding: climate change; loss of biodiversity; mental health and obesity.** Each of these crises are intimately related to and impacted by the built environment so any plan to support increased housing stock must deal simultaneously and appropriately with all these related crises. **A housing shortage is not an excuse for poor development.**

The current crisis in the supply of social and affordable housing is a consequence of decades of neglected investment in this area. Over-reliance on market forces has manifestly failed to meet this element of overall housing demand. Substantial public investment in social and affordable housing and stronger regulation of private development are required to meet the backlog of demand for social and affordable housing. However, we distinguish the market failure to provide social and affordable housing from the ongoing need to supply housing for SEQ’s growing population and reiterate our view that a housing shortage is no excuse for poor development. Our recommendations are aimed at ensuring our future housing stock will deliver a range of **affordable, liveable, sustainable and resilient dwellings** for the people of SEQ.

We note many of the themes and strategies in the draft Update have been included in previous iterations of the SEQ regional plan. We suggest, to date, the missing and most crucial elements have been: **the lack of effective and sustained implementation measures (including infrastructure provision); limited (or non-existent) monitoring, review and evaluation; and a general failure to work in tandem with the community to advance integrated and holistic initiatives.** There has been a lack of ambition to demand better from developers and a failure to engage with the community to prevent localised disputes. The planning community needs to work harder to realise the many laudable objectives of regional planning in SEQ.

In view of these concerns, our key recommendations are:

GROW: With respect to the GROW theme, we recommend:

1. The Planning Department appoints a taskforce to advocate for renters, to identify and address bottlenecks and hurdles to supply and to devise incentives that, in the immediate and short term, will help add to the supply of rentable accommodation from existing housing supply.

2. The Planning Department thoroughly investigates and reports on reasons why the supply of low-medium density housing has lagged behind high density development and identifies specific incentives and measures to encourage gentle densification across the region in line with the wishes of local communities.
3. The Planning Department re-commits to making and honouring integrated neighbourhood and local planning instruments in conjunction with local communities.
4. The Planning Department guarantees appropriate infrastructure (including transport water, sewerage, educational, health and greenspace) is or will be supplied contemporaneously with increasing densification.
5. The Planning Department spearheads a local decentralisation strategy and a state-wide regional population growth strategy that spreads future population growth more evenly across the whole State.

SUSTAIN AND LIVE: In relation to the SUSTAIN and LIVE themes, we recommend:

1. The Queensland Government adopts ambitious, specific and measurable targets for achieving carbon negative emissions in the built environment. By carbon negative, we mean carbon neutral homes and sufficient generation of renewable electricity within the built environment to power domestic vehicles.
2. The Planning Department identifies specific **actions** to achieve the strategies outlined in the SUSTAIN and LIVE themes and dedicates sufficient funding towards their achievement.
3. The Planning Department implements a *Liveability and Sustainability Code* to ensure the themes in SUSTAIN and LIVE are actually applied in all new development.
4. The Planning Department monitors the implementation of the above actions and regularly reports to the community on its progress in implementing them.

Our more detailed observations and recommendations for each of these themes are provided below. Appendix 2 below provides a list of our specific recommendations.

3. GROW

We make the following observations and recommendations in relation to the GROW theme:

3.1 Short term housing shortages & affordability issues

Population growth in the SEQ region has recovered strongly since COVID leading to constraints in the construction of new homes and affordability of existing housing. The causes extend beyond the formal parameters of the planning system (69)¹. The SEQ's region is expecting short term population growth to remain strong to 2026 (67) with average growth thereafter expected to be slower. The most pressing need therefore is to free up affordable housing options over the short term.

The draft Update acknowledges regional planning cannot alleviate pressures on short term housing supply (10). Therefore, short term measures to improve affordable housing supply must be devised

¹ All references are to pages in the draft Update unless otherwise indicated.

separately to and despite anything in the SEQ regional plan including changes to zoning patterns and density limits.

We suggest the following measures could help free up more affordable housing availability in the short term:

Ensure development approvals are activated in a timely fashion

The LGAQ has informed us there are currently 60,000 approved developable blocks across SEQ.² This suggests there is a considerable amount of speculative land banking holding back the supply of new housing. To counter this trend, all development approvals should include a time limit for completion and a sunset clause. Approvals not activated by the end of their currency period should lapse without the possibility of an extension. For development substantially but not fully completed an extension should be premised on the payment of an additional charge (that could contribute towards social and affordable housing) sufficient to penalise land banking and incentivise the timely completion of approved development projects. We need to spend more time ensuring existing approvals are activated in a timely fashion instead of hastily re-zoning more land, a measure that is incapable of delivering new housing within the time frame of the short term “crisis”.

Encourage home owners with spare capacity to consider renting out accommodation

There is scope for encouraging more people to rent out accommodation. The draft Update identifies that we have shrinking households (67). The Queensland Government should act immediately to incentivise more people to rent out vacant accommodation and to assist potential landlords to fast track through the administrative hurdles. It could, for instance, offer free solar panels to homeowners who agree to supply long term rental accommodation for a period of two or more years. This would incentivise rental supply; encourage energy efficiency in a very hard to reach sector and improve the affordability of renting for renters (who are liable for electricity). Another suitable incentive could be taxation and stamp duty relief, a measure which would help landlords renting out accommodation under community title. As things currently stand, home owners, including pensioners, who rent out some part of their property are penalised by the tax system. These bottlenecks and deterrents need to be immediately addressed in order to free up existing but latent supply. We recommend the taskforce suggested above be tasked with this responsibility. It might also review and advise on state taxes on housing e.g. stamp duty with a view to incentivising more homeowners to downsize from a large house to a smaller dwelling.

We note Defence Housing Australia seeks to encourage property owners to rent accommodation through them.³ It offers potential landlords a long-term lease with guaranteed rental income even if the property remains vacant as well as a range of property care services. We believe the Queensland Government should implement a similar scheme

² Poulson, J, “Vacant land shame: 100k blocks sit idle as housing crisis deepens” (26/08/23) Courier Mail at: <https://www.couriermail.com.au/news/queensland/vacant-land-shame-100k-blocks-sit-idle-as-housing-crisis-deepens/news-story/68b4dd9969709af84602581065fb2832>

See also: OSCAR, *OSCAR Recommendations on Addressing Housing Affordability and Availability Crisis Pursuing Strategic Directions arising from the Housing Summit November (07/12/2022)*

³ See: <https://www.dha.gov.au/home>

(whether directly in house or through a competent agency) to help deal with the current rental crisis.

Increase the attractiveness of long term leasing over short term rentals

Across Australia there is a significant number of secondary dwellings that are vacant for long periods of time.⁴ To address the current shortfall in supply of long term rental accommodation, significant taxation relief or other incentives are justified to encourage landlords to rent out vacant property. Currently, there is no consistency between Local Government Areas (LGAs). We note the inconvenience and bureaucracy involved in long term leasing is generally greater than for short term rentals and, as above, urge the government to appoint a taskforce to address these issues and to implement measures to assist potential landlords to deal with these processes.

3.2 Medium and long term housing supply & affordability issues

Medium and long term housing supply issues present a broader a range of issues. They provide our greatest opportunity to ensure new development is sustainable, resilient, nature positive and respectful to local communities. Our recommendations address these issues.

a. High amenity zones

For high amenity zones we make the following observations and recommendations:

Infrastructure: We note the draft Update aims to direct housing density and diversity to high amenity areas (80). These are areas characterised by high frequency public transport, community facilities, open space and activity centres. In more detail, appropriate facilities are listed as: a centre; a major operational bus or train station (or corridor) with frequent services; significant greenspace parks and recreation areas; appropriate educational facilities. We urge the Government to guarantee that high amenity zones will be fully and comprehensively equipped with ALL these facilities before or contemporaneously with any higher densification measures. Access to major transport infrastructure is not on its own a sufficient or complete justification for higher density living.

The provision of infrastructure and all necessary services to match population growth and integrated land use planning depends on funding. State and Federal budgets are all strained at present. Where will the money for infrastructure and services come from? In some regional LGA's, Sunshine Coast for example, there are 4 major transport projects being discussed. Business cases have not yet been completed for at least 2 of the projects and funding approved for only one. Similarly, the Government is planning to increase the region's population by 56% over the next 25 years but its plans to provide the expanded population with reliable water supply are murky at best. This is not good enough. The Planning Department should guarantee appropriate infrastructure (including transport water,

⁴ See: Anon, "Rental Crisis Gold Coast: Reality of the Australian Housing Crisis" Soho (18/08/2023); at <https://soho.com.au/articles/rental-crisis-gold-coast>; Kelly, C, "Rental crisis: Airbnb and holiday home owners urged to let out properties to long-term renters" The Guardian (18/04/2023) at <https://www.theguardian.com/australia-news/2023/apr/17/rental-crisis-airbnb-and-holiday-home-owners-urged-to-let-properties-out-to-long-term-renters>

sewerage, educational, health and greenspace) is or will be supplied **contemporaneously** with increasing densification. A helpful measure for the community would be “trigger points” **guaranteeing the provision of infrastructure as and when densification occurs**. If funding cannot be guaranteed, densification should be postponed.

It is not sufficient simply to re-zone land in high amenity areas. The cumulative impacts of development in high amenity areas should be taken into account. This has not proved to be the case at present with developments allowed that have severely affected the amenity and lifestyle of neighbours. These areas need to be fully and comprehensively planned at the neighbourhood level in conjunction with the local community. Temporary local planning instruments, PDAs and the like, are **not** appropriate mechanisms to achieve good planning for high amenity areas.

Greenspace /publicly accessible open space: The World Health Organisation recommends all urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres’ linear distance (around 5 minutes’ walk) of their homes (WHO: 2017). With the increasing pace of development, Brisbane is at increasing risk of losing its limited, public greenspace – Raymond Park, which provides 50% of Kurilpa’s available greenspace but will for some years be absorbed into Olympics sporting facilities, is a case in point. This trend runs contrary to Government’s much vaunted aspirations for subtropical living, liveable neighbourhoods etc. (2023:168). It also runs counter to the criteria for identifying high amenity areas in the first place – that is, availability of significant greenspace, parks and recreation areas (2023:80). Any loss of publicly accessible, locally available greenspace is simply UNACCEPTABLE. We urge the Government to honour its own commitments and Vision for high amenity areas in this respect and note this means State or local governments will need to provide increased areas of green space in some areas where high population density exists or is planned. We also note that, although they are welcome design elements, green walls, tree canopy and roof top gardens are **NOT** a sufficient substitute for loss of publicly available greenspace at ground level. As a general rule, rooftops should be reserved for solar panels.

Blending with and respecting existing development and character: Whilst we acknowledge a transition to higher density living is inevitable in high amenity zones we feel more work needs to be done to ensure development blends sympathetically with existing development, preserves access to community facilities including greenspace and respects heritage features including character housing; sites and views of interest and mature native trees as per the strategies and elements in LIVE (2023:169-171). All relevant development regulations or codes and all elements of local planning schemes should incorporate consistent and unambiguous performance outcomes that will guarantee these objectives are met. The market failure in housing will only be fixed by firm regulation not by abrogating government responsibility.

With respect to proposed maximum car parking spaces (2023:81), we recommend parking requirements are sufficiently flexible to recognise regional, local and site specific variations in access to active travel and public transport options. Adequate and safe footpaths to alternative modes of transport are essential as well as measures to prevent on-street parking congestion. Access for emergency vehicles must be guaranteed.

High density versus medium density development: In general, we find the draft Update continues the focus on high density development in inner city areas despite producing evidence the least momentum in new housing supply is in relation to low-medium density dwellings (2023:83). The recently endorsed Kurilpa TLPI confirms this continuing focus and illustrates the flaws with this approach. Land in the inner city will always be at a premium meaning the centre of the city is the least cost effective neighbourhood in which to address housing affordability issues. Persisting with this model of development will make it increasingly difficult to maintain the liveability and amenity of “high amenity areas” and may dampen the incentive to provide low-medium density housing spread more evenly and equitably across the region.

The draft Update suggests the high cost of transport infrastructure (for the community and individual commuters) makes concentrating densification in high amenity residential areas an economically attractive option (173). We query that assumption. Many if not the majority of jobs in SEQ are located outside the Capital City centre. In the aftermath of COVID, workers who are based in the CBD are continuing to adopt more flexible work arrangements including working from home. Whilst we applaud the success of measures to prevent the death of the city centre over the past twenty years we believe it is now time to focus on the 20 minute city concept and its precepts.⁵ These favour a decentralised, neighbourhood focussed approach to development (including employment opportunities) spread more evenly across our urban areas. *Brisbane’s Future Blueprint 2018* (discussed below) supports this approach and demonstrates the enthusiasm of the community at large for nurturing cities of neighbourhoods.

For our comments on Resilience in high amenity areas, see section 4 below.

b. Gentle densification

An unmet need: The draft Update identifies the supply of gentle densification housing types has stalled more substantially than that of detached housing or high density development (71). It fails to evaluate the reasons why this is so and it provides very little detail on actual, well targeted measures and incentives that can or will be implemented to redress the current shortfall of low-medium density housing supply. We support measures to encourage gentle densification provided this development is designed and delivered well and in close partnership with local communities.

Our communities have frequently called for and re-affirmed their interest in developing cities of neighbourhoods including well designed, appropriate forms of gentle densification that respect existing amenity.⁶ We all have an interest in embracing development that allows people to live, work and play closer to home. We all have an interest in sufficient housing diversity to meet the needs of different generations and different household budgets –

⁵ See, for instance, State of Victoria Department of Environment, Land, Water and Planning. (2019) *20-minute neighbourhoods. Creating a more liveable Melbourne*, at: https://www.planmelbourne.vic.gov.au/_data/assets/pdf_file/0018/515241/Creating-a-more-liveable-Melbourne.pdf

⁶ Brisbane City, *Brisbane’s Future Blueprint 2018*.

allowing families, neighbours and communities to grow and evolve closer together. We find, to date, neither the building sector nor governments have delivered on these areas of mutual interest (71). On the contrary, members of the community can readily identify examples of poorly designed, attached and medium density dwellings that neither respect existing amenity nor provide sustainable and liveable lifestyles for their incoming residents. We call upon the Government to identify and address the reasons for this undesirable state of affairs and to work with local communities to protect, re-generate and enliven local neighbourhoods including a range of housing types sympathetically designed to blend with existing development.

Design and liveability concerns: An important pre-requisite for all forms of gentle densification, as much as for high density development, is that governments honour their commitments to local communities and provide quality development that blends comfortably with existing development without detrimental impact on local infrastructure, community facilities and greenspace (see above, *Blending with and respecting existing development and character*).

We note one of the Outcomes of the 2022 Housing Summit was a \$5 million funding commitment for a Community Engagement and Awareness Campaign around growth and housing diversity. Whilst we welcome this proposal, we note many communities have already engaged multiple times to influence the content of local planning schemes, neighbourhood plans and city wide planning documents such as *Brisbane's Future Blueprint 2018*. The preference of the community has been made clear on multiple occasions including, for example, in the following principles laid out in *Brisbane's Future Blueprint 2018*:

1. Create a city of neighbourhoods
2. Protect and create greenspace
3. Create more to see and do (including new community parks in the suburbs)
4. Protect the Brisbane backyard and our unique character
5. Ensure best practice design that complements the character of Brisbane
6. Empower and engage residents
7. Get people home quicker and safer with more travel options
8. Give people more choice when it comes to housing

We do not believe our current or proposed models of development faithfully reflect these principles and we call upon all levels of government to **deliver on the goals of the community** as repeatedly expressed and endorsed in numerous planning policy statements and documents. We have talked the talk, it is time for government to walk the walk.

Scale of low and medium density development: One issue that generates community antipathy to development involving “gentle densification” is the overly generous definition of terms. There are very few places in our suburban areas where an eight storey development (currently classed as medium density development) does not present as high storey development creating a significant mismatch with existing development. And whilst three storey development may present an acceptable form of “low density” development in some circumstances, the bulk and presentation of a three storey building is usually very different in scale and intensity to a duplex or town house development. Compounding the problem is the

ease with which stipulated building heights are routinely relaxed. We note the draft Update suggests, 'density bonuses' may be a way of incentivising gentle densification – we wholly reject any form of 'density bonus' that routinely allows building heights in excess of those stipulated in local planning instruments with no apparent gain to the community.

The community will resist any attempt to deal with *all* types of low and medium density development (as currently classed) in a uniform or blanket way including through code assessable development. There is no amount of "community engagement and awareness raising" that will override the genuine concerns of the community in this respect.

To prevent further disaffection and hostility we recommend:

- Low density development should be defined as 1-2 storeys with potential for 3 storey development in pre-determined locations (identified in conjunction with local communities) where impact on neighbouring development will be minimal. Any alternative or additional proposals for 3 storey development should require a rigorous impact assessment process including public notification.
- Medium density development should be limited to 3-5 storeys (approximately tree height) with potential for relaxations up to 6 storeys **only** where the impact on neighbouring properties is minimised by good design elements including setbacks sufficient to allow deep planting; relevant design guidelines, such as those in the Density Done Well Series, are met in their entirety **and** the developer makes a proportionate contribution to social or affordable housing (whether or not in kind) or meets, for example, the sustainability requirements outlined in Brisbane City's Green Buildings Incentive Policy. A benefit to the community at large should be the necessary quid pro quo for development that over reaches the legitimate expectations of the community as expressed in local planning instruments.

c. Greenfield and PDA development

The draft Update continues to place a lot of emphasis on increasing supply through the declaration of PDAs or their like. Many of the existing PDAs have been in existence for some years and yet they still have not delivered large numbers of new lots or dwellings in a period of stated housing shortages. Our concerns about land banking (see above, s.3.1 *Ensure development approvals are activated in a timely fashion*) also apply to PDAs and MDAs which are under government approval processes. For example, the Aura development at Caloundra South has capacity for 20,000 dwellings; it has 13,000 approved lots but only 6,500 constructed lots. Of the 6500 constructed lots only 4,500 plumbing certificates have been issued, which means that only 4500 houses have been completed. There should be a review into the operation and benefits of PDA to test whether they are delivering their intended purpose or not. If not, then the premise in the Draft SEQRP is flawed and another solution is needed.

The Department has, through the declaration of these PDAs, granted exclusive rights (and profits) **without** any commensurate legal obligation to make good on these rights within certain parameters (i.e. timeframes, numbers, price points etc). At present these

development companies have full control on the development, timing and costs of these land areas that they have been granted through these PDA arrangements. The continual use of PDAs and the like without these legal obligations being locked in through contractual arrangements is a failure that should be redressed. A case in point, is the failure of these arrangements to deliver on social and affordable housing. We recommend the Government monitor PDAs and MDAs to ensure that agreed numbers of social and affordable housing are actually delivered in a timely fashion and that a diverse range of residential housing is supplied. The actual numbers completed should be reported annually to the State Government or High Level Task force.

d. Social and affordable housing

Direct Investment: We acknowledge and welcome recent initiatives by the Queensland Government to improve the supply of social and affordable housing in SEQ. We note the Queensland Government has committed \$2 billion to the Housing Investment Fund and \$70 million to support Build-to-Rent projects. We recognise there is a generational shortfall of social and affordable housing across SEQ and, in the lead up to the Olympics that situation is likely to get worse. We therefore call upon the Government to set needs based targets for **actual numbers** of social and affordable dwellings required and to monitor progress in meeting those targets carefully. We urge the Government to maintain and increase the budget for social housing to meet 100% of the estimated need for social housing by or before 2032 and to introduce other measures, including but not limited to inclusionary zoning, to ensure the backlog of supply for social and affordable housing is and will continue to be met.

The State Government must not miss the opportunity to provide purpose built social and affordable housing during the preparations for the Olympics. All the proposed Athletes villages in Queensland could be designed to be used as social and affordable housing both prior to and after the 2032 Olympics. We do not want a repeat of the Smith Collective in Parklands where not one unit fits the criteria for affordable house (1 Bedroom from \$550, 2 Bedroom from \$660 and 3 bedroom townhouse from \$835 per week).

All government built social and affordable housing must remain in public hands. We know from previous experience that this leads to increased affordable housing across the board. Social housing has been sold off by governments for many years. Relying on the private sector to meet the required shortfall has led to our current housing crisis. Social housing in particular needs to be provided and managed by the Government.

Community housing schemes should also be promoted by the State government. This could involve some form of seed funding or co investment by the government.

Inclusionary zoning: Inclusionary zoning is a land use planning intervention by government that either mandates or creates incentives so that a proportion of a residential development includes a number of affordable housing dwellings.⁷ We are of the view, developers building high density residential accommodation in inner city areas should be obliged to allocate 20% (or an equivalent contribution to a housing fund) of new development to meet social and

⁷ <https://www.ahuri.edu.au/analysis/brief/understanding-inclusionary-zoning>

affordable housing in perpetuity. This would be comparable with schemes in other jurisdictions.⁸ Development plans for **all** PDAs should include a similar requirement to supply social and affordable housing. Councils in the SEQ region appear to have abdicated their responsibility to make a greater contribution in this area and we recommend **URGENT** attention is given to this matter. The current situation demonstrates the market left to itself, will not supply sufficient social or affordable housing to meet the need so **appropriate regulation** is urgently required along with transparent monitoring and enforcement measures.

Pathways shared equity scheme: We applaud the Queensland Government for creating a shared equity scheme but note it has very limited parameters only applying to tenants in government owned housing. Firstly, we recommend the government guarantees to fully replace public housing leaving the government owned stock through this scheme. Secondly, we recommend the scheme be enlarged to offer a joint equity pathway (similar in design but additional to any offered by the national government) for people not renting government owned housing.

Siting: Social and affordable housing should be distributed across the whole City in a range of densities compatible with local zone plans. We recognise some people will need social housing close to their local city centre. For example, single parents trying to study while on benefits; people with families whose children attend state schools in the city centre or older people with family and social networks in these suburbs. Other people seeking social housing may prefer to live in the middle or outer suburbs. They may not be employed in or seeking work in the inner city. They may prefer easy access to relatives and existing community networks; schools, local shops and services and local employment opportunities in the suburbs.

Additional housing supply in the middle and outer suburbs is less prone to gentrification and /or up-zoning so should be cheaper to secure and build on. Siting social and affordable housing in less competitive areas will more readily allow for a variety of housing types to be provided without detriment to liveability features on site and in the local community. One example might be to allow / encourage /ensure neighbourhood commercial centres provide social and affordable accommodation in storeys above street level development.

People eligible for social housing should be granted free or subsidized access to public transport to help overcome access / mobility issues. Suburbs with limited access to public transport should be prioritised for improved services (in line with LIVE: Element 4: Fairness).

3.3 Streamlining and fast track development

The draft Update foreshadows “a range of potential changes to Queensland’s planning system to de-risk and unblock processes to provide more homes faster” (38). As there are currently 60,000 developable blocks identified across SEQ,⁹ the efficacy of this strategy is questionable. In our view,

⁸ <https://www.ahuri.edu.au/analysis/brief/understanding-inclusionary-zoning>

⁹ OSCAR, *OSCAR Recommendations on Addressing Housing Affordability and Availability Crisis Pursuing Strategic Directions arising from the Housing Summit November (07/12/2022)*.

relaxing planning laws and regulations does not and will not guarantee the delivery of diverse, sustainable, liveable or even affordable housing. On the contrary, good planning, that preserves our existing natural assets and respects community identity and liveability, ensures better public health and wellbeing outcomes for new and existing communities. It means SEQ remains an attractive destination for migration and, as reported in the Government's own literature, housing that is sustainable and resilient is the most affordable for residents in the long term.¹⁰

The draft Update envisages local governments will work with the State government to develop housing supply statements, housing strategies, implementation plans and development codes to achieve greater residential densities (81). Nowhere in this array of new plans and instruments is there any mention of including and partnering with the community to achieve better outcomes. We are alarmed at this proposed trajectory. In both planning and development assessment the community has already been largely side-lined: the law no longer protects the integrity and pre-eminence of the local planning scheme when development is assessed and members of the public are already largely disenfranchised from any meaningful participation in code assessable development. This is unacceptable. We suggest any planning process that further excludes public participation will serve to further alienate the community; delay and frustrate development and generate sub-standard planning outcomes. This is particularly so with respect to any new codes or regulations aiming to standardise and fast track three storey and medium density development across the region. If the government wishes to bring the community on board to gentle densification, it must work in partnership with it to ensure the legitimate concerns of the community are appropriately accommodated. We are seeking an unqualified assurance this will be the case.

3.4 Community engagement and the role of local planning schemes

We note one of the Outcomes of the 2022 Housing Summit was a \$5 million funding commitment for a Community Engagement and Awareness Campaign around growth and housing diversity. We call upon the Queensland Government and local councils across the SEQ region to ensure the promised Community Engagement and Awareness Campaign offers meaningful and genuinely participatory opportunities for the community to engage with, plan for and influence the shape, character and quality of our future residential communities.

We also note many communities have already engaged multiple times to influence the content of local planning schemes, neighbourhood plans and city wide planning documents such as *Brisbane's Future Blueprint 2018*. The preference of the community has been made clear on multiple occasions including, for example, in the principles laid out in *Brisbane's Future Blueprint 2018* (see above, gentle densification – design and liveability issues).

We do not believe our current or proposed models of development faithfully reflect these principles and we call upon all levels of government to **deliver on the goals of the community** as repeatedly expressed and endorsed in numerous planning policy statements and documents. We have talked the talk, it is time for government to walk the walk.

In particular, we call upon the Government to:

¹⁰ <https://www.epw.qld.gov.au/about/initiatives/modern-homes/residential-energy-efficiency-standards>

- consult early and respectfully with the community;
- give priority to neighbourhood plans and neighbourhood development codes over all other codes;
- specify in advance that relaxations will only be allowed in very specific circumstances and, if requested, the application becomes impact accessible immediately;
- ensure proposals that don't meet neighbourhood code performance outcomes (including any permitted relaxations) are assessed as impact assessable development; and
- ensure private certifiers are only allowed to assess and approve development applications that meet all neighbourhood code requirements. Certifiers found to be approving inappropriate development applications should be disqualified from future certification.

3.5 Need for a regional growth and housing strategy across Queensland

There are physical and environmental constraints – in land supply, biodiversity conservation and water supply etc. – that increasingly impede sustainable population growth in SEQ. Fortunately, across Queensland, three of the four fastest growing regions, accounting for over 35% of new jobs, lie outside SEQ – in Wide Bay, Townsville and Central Queensland.¹¹ The Energy and Jobs Plan is further evidence of the healthy development prospects for regional Queensland. It predicts the renewable energy industry will generate 100,000 new jobs up to 2040, primarily in regional areas.¹² In these circumstances, we query the draft Update's assumption the SEQ region will continue to accommodate 80% of all migration into Queensland. It seems to us both desirable and sensible to ensure a better distribution of the incoming population across the State to help bolster the regional economy. The housing shortage in regional Queensland is currently even more severe than in SEQ. We therefore call upon the Government to devise a proactive regionalisation strategy including the provision of more housing, jobs and amenities in regional Queensland where there is enormous scope for accommodating more people in relatively more affordable, liveable and less environmentally constrained circumstances.

The Federal Government sets the number of immigrants into the country each year but it is both the State and the Local Government levels that fund the necessary infrastructure to settle them into their new environment. Federal funding to match immigration numbers must be provided to State and Local government levels. Local government in particular is straining under the financial load of accommodating new residents. In 2012, this was estimated at \$170,000 per new resident in Queensland.¹³ It has no doubt increased substantially since then.

¹¹[https://statements.qld.gov.au/statements/98374#:~:text=Jobs%20Queensland's%20fourth%20Anticipating%20Future,an d%20Central%20Queensland%20\(11.5%25\)](https://statements.qld.gov.au/statements/98374#:~:text=Jobs%20Queensland's%20fourth%20Anticipating%20Future,an d%20Central%20Queensland%20(11.5%25))

¹² See: <https://www.epw.qld.gov.au/energyandjobsplan>

¹³ O'Sullivan, Jane N, "The burden of durable asset acquisition in growing populations" (2021) *Economic Affairs* 32 (1) 31-37 <https://doi.org/10.1111/j.1468-0270.2011.02125.x>

4 Sustain

First Nations people: We welcome any initiatives to engage with First Nations people and to more truly represent their culture within the planning system.

Biodiversity: The draft Update aims to protect and enhance the regional biodiversity network (143) but offers no new or convincing measures to implement this Element. On the contrary, it states regional biodiversity values will be “investigated and refined by local government for protection as matters of local environmental significance” (153). This has not and will not serve to prevent further fragmentation and will not in any way ensure the protection of regional biodiversity values. Local governments do not have access to the full range of protective measures available to the State. All regional biodiversity values and all regional biodiversity corridors need to be dealt with as matters of **state environmental significance** to ensure they attract stronger protection and coordinated planning and to ensure greater transparency in monitoring and tracking of any habitat or species loss. They also require public investment and active management to ensure their biodiversity values are sustained and enhanced over time.

We note the goals for koala conservation include supporting viable koala populations and ensuring habitat connectivity for long term viable populations with coordinated planning and focused management and investment programs (143). We urge the Government to provide clear and simple annual public reporting of estimated koala numbers and koala fatalities in each local government area of south east Queensland.

In line with its commitments under the *Nature Conservation Act*, we call upon the State Government to progress similar initiatives for all endangered native fauna and flora endemic to SEQ. We note there are NO ACTUAL MEASURES identified to improve the protection and rehabilitation of our biodiversity (other than koalas) despite the aspirational statements in Element 2. In essence, the approach seems to be ‘more of the same’ despite clear evidence that approach is not working¹⁴ and, given what we know about climate change, will become more futile over time.

There is a lack of clarity about the inter-relationships between the regional biodiversity network, regional landscapes and inter-urban breaks. The agenda for regional landscapes (Element 4) seems to wholly subjugate biodiversity conservation to recreational and amenity imperatives despite acknowledging these areas provide vital “ecosystem services” (presumably including biodiversity) and will frequently overlap with the regional biodiversity network (159). We acknowledge the importance of greenspace for recreational and amenity purposes but all development for such purposes needs to be consistent with and subservient to conservation imperatives.

The elements in Sustain are primarily focussed on regional networks, catchments, corridors and large areas of species richness (153). We acknowledge the importance of these areas but note that even small areas of old growth vegetation, including mature aged trees can support rich biodiversity and are worthy of protection from urban development. Healthy Land and Water has mapped old growth

¹⁴ For instance, in the measures that matter for SUSTAIN, water catchment health receives a D+ (poor) grade. See:

<https://planning.dsdmip.qld.gov.au/mtm?theme=sustain>

In the Healthy Land and Water Report card 2022, seven catchment areas received a D (poor) or F (fail) grade for overall environmental condition. See: <https://reportcard.hlw.org.au/>

areas across SEQ. We urge the State government to work closely with Healthy Land and Water to identify and coordinate measures to protect these areas of species richness (for instance, under the *Nature Conservation Act*) whether or not they are currently identified as matters of state or regional significance.

We welcome the proposal to conduct bioregional planning for PFGAs but call upon all levels of government to ensure there is a transparent and participatory process involved in this level of planning.

We welcome the proposal to work in a coordinated fashion with the Resilient Rivers Initiative (Element 5) and await with great interest to see what this actually entails. At a minimum, we expect to see increasing use of vegetation buffers to protect waterways from the impacts of development and agricultural uses.

Overall, we note that environmental quality has remained poor over the life of the regional plan. Therefore it is imperative new, stronger measures and additional funding are allocated to this aspect of the regional plan. Unlike housing supply, which is affected by a complex range of issues some of which fall outside the scope of regional planning (68), coordinated planning and protection combined with targeted investment are well known to be effective strategies for improving biodiversity conservation. We suggest the regional planning team work far more cohesively with DES and SEQ Healthy Land and Water to strengthen this aspect of regional planning.

Climate change: We applaud the policy intent of Element 7 (Climate change) but note the absence of any specific targets or commitments to reducing greenhouse gas emissions in the built environment. All the strategies in this Element are aspirational and there are no supporting measures or identified actions to advance this Element.

The disparity between the emission reduction target adopted in the Queensland Climate Action Plan 2030 and the Energy and Jobs Plan is noted in the draft Update without any further comment (162). It appears there is NO specific target for reducing emissions in this sector of the economy even though the built environment constitutes 19% of our direct greenhouse gas emissions¹⁵ and is also the key to unlocking a rapid transition to electrification of transport through home charging. We find this section of the report fails to identify any specific, ambitious and enforceable actions.

We acknowledge the construction industry is transitioning to a 7 star energy efficiency requirement for single dwellings under the National Construction Code. We call upon all levels of Government to adopt a roadmap to rapidly transition to a more ambitious target and to ensure all medium and high density dwellings also adopt a similar or higher standard of efficiency than is currently the case. We urge the government to ensure all new high density development includes power points (minimum 15 amp) for electric vehicle charging in every parking space and an embedded energy network, including battery installations, to maximise energy efficiency. We must build for a future that is rapidly transitioning out of carbon energy.

We call upon the Government to adopt specific and ambitious targets for solar penetration across the built environment and to fast track a rapid and more comprehensive penetration of solar panels across all elements of the built environment including existing buildings, low, medium and high density

¹⁵ See: <https://www.energy.gov.au/government-priorities/buildings>

residential development, industrial and commercial development and community infrastructure. We note, some landlords are prohibiting the installation of solar panels on commercial leasehold properties - yet solar panels are transferable so commercial tenants could easily remove solar panels at the end of their lease. Likewise some landlords and body corporates are prohibiting tenants from installing power points for electric vehicles. These issues need to be addressed and actively prevented from occurring. Regrettably, strong leadership and genuine commitment to implementation is altogether lacking in the aspirational statements and strategies identified in the regional plan. It is time to do better and deliver outcomes not just strategies.

We urge the State government to follow other states in prohibiting the supply of natural gas to any new residential development with immediate effect and we urge the Government to fast track the development of localised energy networks to help stabilise and support the national grid. These are all practical, specific measures that can be adopted separately to the National Construction Code.

We call upon the State government to repeal the *Planning Act*, s 8(5), which prevents local governments unilaterally adopting higher standards of efficiency or more ambitious design elements for sustainability in the built environment. We need to encourage innovative councils and their communities and not disenfranchise them.

Other recommendations for enhancing sustainability in the built environment are noted below (see our comments on LIVE and Appendix 3).

Resilience: We believe the regional plan should explicitly address the risks to SEQ of: sea level rise; increased intensity of tropical cyclones; increased exposure of coastal areas to tropical cyclones and increasing risks of bushfire due to global warming.

We welcome the intention to integrate natural hazard risk management and adaptation planning processes at the regional scale to provide greater consistency. We anticipate this will also lead to better, more consistent funding for works and initiatives identified in such plans. We also welcome the intention to identify No-go future development areas.

We note the draft Update references the SPP which it claims sets “clear expectations for the planning system” and “promotes an approach of risk avoidance first in preference to mitigation” (162, 163). We make the following observations regarding the SPP:

- The SPP principles only apply to *natural hazard areas*. There are multiple classifications of natural hazard areas in different pieces of legislation – it is unclear which definitions apply in this case. What is clear is that the impacts of natural hazards are not confined to natural hazard areas.
- There is no guidance on when decision-makers may decide it is ‘not possible’ to preference risk avoidance first (and the statement requesting them to do so is only made once) (51).
- The SPP principles do not apply to urban development in urban areas including any land within the urban footprint even if that land is designated an erosion prone area (51).
- The SPP references adopting mitigation measures that reflect an acceptable or tolerable risk – but these terms are very ambiguously defined (51).

We seek clarification of these issues and a risk-based, natural hazard strategy that encompasses all at risk land not just land identified as a 'natural hazard area'.

We note SEQ councils are currently planning for increased densification, including high density development, in areas prone to flooding and /or coastal hazards and /or bush fires. As a general rule, good planning dictates no further urban densification should be contemplated on land particularly prone to extreme weather events – such as flood plains. We query why /when it is considered 'not possible' to avoid any further intensification of development in these areas.

Should further densification be contemplated, then all new development must necessarily be built to withstand extreme weather events of ever greater intensity and frequency as projected in the draft Update (2023:141). With respect to identifying levels of acceptable or tolerable risk, in areas prone to flooding (whether or not identified as a natural hazard area) we recommend:

- Community infrastructure and high density development should be built to withstand the probably maximum flood.
- Medium density development should be built to withstand at least a 0.2% AEP (or 1 in 500 year) flood event.
- Emergency access, egress and early warning systems for extreme weather events are required as conditions of development as a matter of course.
- For development in any area known to be particularly impacted by extreme weather events whether or not sited within a formally declared natural hazard area, the SPP principles for development in natural hazard areas should be strictly and transparently adhered to as conditions of development. In particular, the community needs to be assured that development, "directly, indirectly and cumulatively avoids an increase in the exposure or severity of the natural hazard and the potential for damage on the site or to other properties" and "maintains or enhances the protective function of landforms and vegetation that can mitigate risks associated with the natural hazard" (SPP 2017:52).
- Development approvals in locations affected by natural hazards are made fully available to the public with an accessible, plain English explanation of the nature of the hazard, design solutions and development conditions required to address it. This will assist in building community understanding, preparedness and resilience. This information should be made available at point of sale to new residents and the existing community alike.

Heatwave and urban heat considerations: We welcome the attention to tree canopy coverage in Element 8.6 but query the very low target (15% minimum cover) for the Capital city centre (145). City centres are where urban heat issues will present with greatest intensity. We recommend adopting more ambitious targets for the Capital city centre and urban residential areas (25% minimum cover) where greater densification is most likely to occur. We note also that urban tree canopy is not a sufficient substitute for preserving existing mature aged trees or for providing greenspace in accordance with the WHO recommendations (see our comments under LIVE below).

SEQCA's mission is to argue for development that is sustainable, resilient, nature positive and respectful of local character and liveability. We argue these characteristics are not only highly desirable in their own right but also offer the only meaningful way to provide affordable and liveable housing over the long term. We welcome all the Elements and Strategies in the LIVE theme but have two main concerns:

Will design guidelines and voluntary schemes actually be implemented? We note the draft Update refers to design guides in existence or planned (169, 172). We are not persuaded these best practice design guidelines are or will be followed in all or even any significant number of new developments. Instead, we find good design elements all too readily give way to profit-maximisation at the behest of developers who rely on a general desire for increased or affordable housing supply to justify the delivery of sub-standard outcomes in all other respects including those pertinent to LIVE. We therefore challenge the government to monitor and transparently report on the number of new developments that actually do comply with all aspects of existing best practice design guidelines and to explain to the community why developments that fall short of these standards are still being approved despite the laudable strategies for LIVE identified in the regional plan.

We note there is a suggestion design guidelines may be incorporated into form-based codes (172). We welcome this proposal and make suggestions for a *Liveability and Sustainability Code* in Appendix 3. However, we recognise that, so long as development assessment remains discretionary and performance based, such a measure would provide no greater guarantee that the laudable outcomes envisaged in the LIVE theme will actually be implemented. In this respect we draw attention to *Planning Act*, s 60(2) which states: [An assessment manager] “may decide to approve the application even if the development does not comply with some of the assessment benchmarks.” In our view, reform of this statutory carte blanche to development is a pre-requisite to lifting the design standards of development.

Are the identified strategies sufficiently ambitious? Given the concurrent crises we are facing – climate change, loss of biodiversity, mental health and obesity – and the influence the built environment has on each and every one of these matters we do not believe the existing measures and the proposed strategies in SUSTAIN and LIVE go far enough or fast enough to deal with the relevant issues. This is not good enough. We need ALL new development to provide *enhanced* sustainability, *improved* resilience to climate change and *more ambitious* nature positive outcomes – and all without delay. In Appendix 3, below, we propose a new *Liveability and Sustainability Code* to help realise these goals.

Additional strategies and actions for LIVE

Whilst we welcome all the aspirational statements and strategies identified in the LIVE theme, we believe the following strategies also need to be recognised and acted upon:

Public open space: Element 1 refers to the importance of inter-active public and open spaces. We believe public space needs to be freely accessible, non-commercialised and predominantly nature-based in character. Shopping precincts and other commercial operations, in themselves, are not a substitute for publicly accessible greenspace.

Backyard greenspace: Element 2 refers to design outcomes that are ‘adaptive and responsive’ to SEQ’s climate and Element 5 aims for development to ‘work with natural systems’. The community has consistently protested at the loss of backyard space in new development. This trend is a poor deal for children’s health, safety and wellbeing and runs counter to the passive design objectives for maintaining liveability, subtropical design elements and outdoor living. It runs counter to the much lauded notion of greening and cooling through natural elements (166); intensifies the impacts of heatwaves, droughts and floods; compounds noise and neighbourhood nuisances and reduces urban greenspace. We recommend the loss of backyard space and existing tree cover is closely monitored and reported on. We also recommend every neighbourhood should have a minimum threshold for backyard greenspace overall and all development must accommodate that threshold or supply additional public greenspace in the same locality to compensate for any further loss. Increased tree canopy is NOT a substitute for greenspace as tree cover alone does not create communal, child friendly recreational opportunities.

Local character: We applaud the intent of Element 3 but note we have no evidence these aspirational goals are routinely put into practice. We call upon the Government to genuinely commit to this objective and, true to its intent, immediately reconsider its decision to demolish and relocate East Brisbane State School.

Local parks and greenspace: Element 5 makes reference to ‘urban greening networks’. The World Health Organisation recommends all urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres’ linear distance (around 5 minutes’ walk) of their homes (WHO: 2017). We are seeking an assurance the WHO guideline will be implemented across every neighbourhood in SEQ and believe this is an absolute, non-negotiable aspect of liveability across the SEQ region. Increased tree canopy, green landscaping and green walls are welcome design elements but they are NOT a substitute for the recreational and other benefits of publicly accessible, communal greenspace.

Existing tree protection: Element 5 makes reference to protecting significant trees and large shade trees. We call upon the Government to demonstrate its commitment to this objective by strengthening protections for existing mature trees in new and existing development. We recommend the Government monitors and reports publicly and regularly on the loss of existing mature tree cover across the region.

6 Implementation, governance and measures that matter

In this submission we have noted many existing policies that are either not being implemented or not being transparently monitored. To improve on this situation we recommend Measures that Matter be devised to accurately, regularly and transparently monitor implementation across these issues:

GROW: Additional Key indicators

1. Number of social housing dwellings added to existing stock per annum.
2. Number of affordable housing dwellings added in perpetuity to the housing stock per annum.
3. Number of vacant dwellings per annum and trend over time as a proportion of total housing stock.
4. Number of dwellings let to short term renting and trend over time as a proportion of total housing stock.
5. Percentage of dwellings that are owner occupied.
6. Number of un-activated / extended residential development approvals per annum.
7. Completion times for new residential development approvals to be fully built and variations over time.

SUSTAIN AND LIVE: Additional Key indicators

1. Number of dwellings (and as a proportion of all dwellings) across SEQ with access to UNESCO recommended amount of greenspace – in amount and proximity – and any changes thereto over time.
2. Extent and approximate age of tree canopy in each urban area and each suburb – and any changes over time.
3. Number of trees subject to a tree preservation order in each local council area – and any changes over time.
4. Area of backyard greenspace by suburb as a proportion of total suburb area - and any changes over time.
5. Number of development approvals issued for residential development reaching a ten star NatHERS efficiency standard (or similar best practice efficiency rating) per annum and as a proportion of all residential development approvals.
6. Number of dwellings applying for assistance from the Resilient Homes Fund (including type of assistance) per annum.
7. Number of dwellings granted assistance from the Resilient Homes Fund (including type of assistance) per annum.
8. Annual increase in solar panel penetration across all buildings by sector (residential, commercial, industrial and community).
9. Proportion of high density development approvals issued with provision for electric charging for all vehicles.
10. Proportion of high density development approvals issued with provision for embedded energy facilities.
11. Annual estimated koala numbers and koala fatalities in each local government area.
12. Extent, location, current status and development risks to habitat for all at risk and endangered native species across SEQ

13. Extent, location, current status and development risks to old growth native vegetation across SEQ.

Appendices

Appendix 1: About SEQCA

The Southeast Queensland Community Alliance (SEQCA). SEQCA is a not-for-profit umbrella organisation formed by planning and environmental advocacy groups based across SEQ. Member organisations are interested in planning and development issues affecting communities across South East Queensland. Our member organisations include:

- Gecko Environment Council Assoc. Inc.
- Gold Coast Community Alliance.
- Redlands 2030 Inc. (R2030)
- Brisbane Residents United Inc. (BRU)
- Sunshine Coast Environment Council Assoc. Inc. (SCEC)
- Organisation Sunshine Coast Association of Residents Inc. (OSCAR)
- Brisbane Region Environment Council Inc.
- Logan Ratepayers Association
- Bellbird Park Community Assoc.
- Brisbane Flight Path Community Alliance

As an umbrella organisation serving the SEQ region, our mission for the communities and buildings we live in is:

Fast track to sustainability: Water wise and carbon negative.

Pursue resilience: Lifting the benchmarks and not compounding the problems.

Defend our greenspace: Safeguarding our existing greenspace and adding to the stock.

Secure our local: Ensuring the character and liveability of our communities is not overwhelmed by bland, profit driven development.

Fight for transparency: Work with governments at all levels to protect and implement our Vision.

More information about SEQCA is available on our website at: <https://seqalliance.org/>

Appendix 2: List of specific recommendations

GROW

ALL DEVELOPMENT

1. Appoint a taskforce to investigate the opportunities and barriers to bringing more rental properties onto the market from existing housing supply.
2. Incentivise existing home owners with spare capacity to consider renting out accommodation.
3. Incentivise long term leasing over short term rentals.
4. Ensure all development approvals include a time limit for completion and a sunset clause to ensure new development is brought to the market in a timely fashion.
5. Devise a proactive regionalisation strategy including the provision of more housing, jobs and amenities in regional Queensland.

DEVELOPMENT IN HIGH AMENITY AREAS

6. Ensure high amenity areas are fully and comprehensively planned at the neighbourhood level in conjunction with the local community PRIOR to any re-zoning for higher density.
7. Ensure appropriate levels of infrastructure (transport, water, sewerage, educational, health and greenspace) are enhanced and supplied before or contemporaneously with any re-zoning for higher density.
8. Proposed maximum car parking space requirements should recognise regional, local and site specific variations in access to active travel and public transport options.
9. Adequate and safe footpaths to alternative modes of transport must be provided.
10. Implement measures to prevent on-street parking congestion.
11. Access for emergency vehicles to every dwelling must be guaranteed.

GENTLE DENSIFICATION

12. Low density development should be defined as 1-2 storeys (maximum 8.5 metres) with potential for 3 storey development (maximum 12 metres) in pre-determined locations (identified in conjunction with local communities) where impact on neighbouring development will be minimal.
13. Medium density development should be limited to 3-5 storeys (approximately tree height) with potential for relaxations up to 6 storeys in appropriate localities (for instance, those already characterised by buildings of different heights) and where the impact on neighbouring properties is minimised by good design elements including setbacks sufficient to allow deep planting; relevant design guidelines, such as those in the Density Done Well Series, are met in their entirety and the developer makes a proportionate contribution to social or affordable housing (whether or not in kind) or meets, for example, the sustainability requirements outlined in Brisbane City's Green Buildings Incentive Policy.
14. Ensure the promised Community Engagement and Awareness Campaign offers meaningful and genuinely participatory opportunities for the community to engage with, plan for and influence the shape, character and quality of our future residential communities.

PDA AND MDAs

15. Monitor PDAs and MDAs to ensure that agreed numbers of social and affordable housing are actually delivered in a timely fashion and that a diverse range of residential housing is supplied.

SOCIAL AND AFFORDABLE HOUSING

16. Maintain and increase the budget for social housing to meet 100% of the estimated need for social housing by or before 2032.
17. Introduce additional measures, including but not limited to inclusionary zoning, to ensure major new housing supply includes social or affordable housing including build to rent options.
18. All the proposed Athletes villages in Queensland should be designed to be used as social and affordable housing prior to and after the 2032 Olympics.
19. All government built social and affordable housing must remain in public hands.
20. Developers building high density residential accommodation in inner city areas should be obliged to allocate 20% (or an equivalent contribution to a housing fund) of new development to meet social and affordable housing in perpetuity. Development plans for all PDAs should include a similar requirement.
21. With respect to the Pathways shared equity scheme, the government must fully replace public housing leaving the government owned stock through this scheme on ongoing basis.
22. The Pathways shared equity scheme should be enlarged to offer a joint equity pathway (similar in design but additional to any offered by the national government) for people not renting government owned housing.
23. Social and affordable housing should be distributed across the whole City in a range of densities compatible with local zone plans.
24. People eligible for social housing should be granted free or subsidized access to public transport to help overcome access / mobility issues.
25. Suburbs with limited access to public transport should be prioritised for improved services.

SUSTAIN

BIODIVERSITY

1. All regional biodiversity values and all regional biodiversity corridors should be dealt with as matters of state environmental significance to ensure they attract stronger protection and coordinated planning and to ensure greater transparency in monitoring and tracking of any habitat or species loss.
2. All development in the regional greenspace network – including recreational and amenity uses - needs to be consistent with and subservient to conservation imperatives.
3. There should be a transparent and participatory process involved in bioregional planning for planned future growth areas.
4. Stronger measures and additional funding should be allocated to the SUSTAIN theme. The DISLGP should work with DES and SEQ Healthy Land and Water to strengthen this aspect of regional planning.

ENERGY EFFICIENCY

5. Adopt a roadmap to rapidly transition to a more ambitious emissions reduction target for the built environment including new development.
6. Adopt specific and ambitious targets for solar penetration across the built environment and to fast track a rapid and more comprehensive penetration of solar panels across all elements of the built environment.
7. All new high density development should include power points (minimum 15 amp) for electric vehicle charging in every parking space and an embedded energy network, including battery installations, to maximise energy efficiency.
8. Prohibit the supply of natural gas to any new residential development with immediate effect.
9. Fast track the development of localised energy networks to help stabilise and support the national grid.
10. Repeal the *Planning Act*, s 8(5), which prevents local governments unilaterally adopting higher standards of efficiency or more ambitious design elements for sustainability in the built environment.

RESILIENCE

11. Include a specific assessment of the risks to SEQ associated with sea level rise; increasing intensity of tropical cyclones; increasing exposure of SEQ coastal areas to tropical cyclones and increasing risks of bushfire due to global warming.
12. As a general rule, there should be no intensification of development on land particularly prone to extreme weather events.
13. In flood prone areas, if development is allowed, community infrastructure and high density development should be built to withstand the probable maximum flood.
14. In flood prone areas, if development is allowed, medium density development should be built to withstand at least a 0.2% AEP (or 1 in 500 year) flood event.
15. In areas prone to extreme weather events, emergency access, egress and early warning systems for extreme weather events should be required as conditions of development as a matter of course.
16. In areas prone to extreme weather events, development must directly, indirectly and cumulatively avoid any increase in the exposure or severity of the natural hazard and the potential for damage on the site or to other properties.
17. In areas prone to extreme weather events, development must maintain or enhance the protective function of landforms and vegetation that can mitigate risks associated with the natural hazard.
18. Development approvals in locations affected by natural hazards should be made fully available to the public with an accessible, plain English explanation of the nature of the hazard, design solutions and development conditions required to address it. This information should be made available at point of sale to new residents and the existing community alike.
19. Adopt more ambitious targets for tree canopy in the Capital city centre and urban residential areas where greater densification is planned and heat island effects will be most intense.

LIVE

1. Implement a *Liveability and Sustainability Code* to ensure the themes in SUSTAIN and LIVE are actually applied in all new development.
2. Ensure all new residential development provides access to publicly accessible green spaces of at least 0.5–1 hectare within 300 metres' linear distance of all new homes (as recommended by the World Health Organisation).
3. Develop and honour local neighbourhood plans to ensure development for increasing density blends sympathetically with existing development, preserves access to community facilities including greenspace and respects heritage features including character housing; sites and views of interest and mature native trees.
4. Ensure all relevant development regulations and codes and all elements of local planning schemes incorporate consistent and unambiguous performance outcomes that will guarantee the above objectives are met.
5. Give priority to neighbourhood plans and neighbourhood development codes over all other planning scheme codes during development assessment.
6. Specify in advance that relaxations will only be allowed in very specific circumstances and, if requested, the application becomes impact accessible immediately.
7. Ensure private certifiers are only allowed to assess and approve development applications that meet all neighbourhood code requirements.
8. Revise s 60(2) of the *Planning Act* to ensure higher design standards are not compromised during development assessment.
9. Ensure public space requirements are freely accessible, non-commercialised and predominantly nature-based in character.
10. Ensure shopping precincts and other commercial operations, in themselves, are not accepted as a substitute for publicly accessible greenspace.
11. Monitor and report on the loss of backyard space and existing tree cover in every suburb.
12. Adopt a minimum threshold for backyard greenspace (overall) in every suburb and ensure all residential development falls within that threshold or supplies additional public greenspace to compensate for any further loss.
13. Reconsider the decision to demolish and relocate East Brisbane State School.
14. Strengthen protections for existing mature trees in new and existing development.
15. Monitor and report publicly and regularly on the loss of existing mature tree cover in urban areas across the region.

IMPLEMENTATION AND GOVERNANCE

In our submission we propose 20 new Measures that Matter to accurately, regularly and transparently monitor implementation across the issues we have identified above.

Appendix 3: Proposed Liveability and Sustainability Code

We propose a new *Liveability and Sustainability Code* that will ensure all new development protects and promotes the liveability and sustainability of SEQ. Below we draw on existing initiatives and rating tools to suggest the types of measures and acceptable outcomes that might be included in this Code.

We are aware that Brisbane City Council has a Green Buildings Incentive program which offers a subsidy up to 50% of infrastructure charges to developments that meet the requirements of that program. In our view, the tax payer should not be subsidising what should be the “new normal” for development, especially not in relation to high density development. Instead, we propose that developers who *cannot or do not* wish to meet the performance outcomes of our proposed *Liveability and Sustainability Code* should be charged a significant additional levy that will be used to help fund social housing initiatives.

Proposed overall performance outcome for liveability and sustainability

Development protects and promotes the liveability and sustainability of SEQ by complying with the Acceptable outcomes outlined below.

Acceptable Outcomes: Buildings up to five storeys

Achieve NATHERS 7 star energy rating and also:

- For buildings that are three-five storeys,¹⁶ satisfy the design requirements of the Brisbane City *Green Buildings Incentive Policy* that are readily applicable to buildings up to five storeys;¹⁷ or
- Provide grey water recycling and /or on-site rain water storage and /or larger covered outdoor living space and /or additional roof top solar panels over and above any relied on to comply with the NATHERS 7 star energy rating requirement;¹⁸ or
- Satisfy the acceptable outcomes identified in Table 1, Column 1 (below).

Acceptable Outcomes: Buildings over five storeys

Achieve NATHERS 7 star energy rating and also:

- Satisfy the requirements of the Brisbane City *Green Buildings Incentive Policy*; or
- Satisfy the acceptable outcomes identified in Table 1, Column 2.

Acceptable Outcomes: Greenfield development

Achieve enhanced environmental outcomes for all building work as outlined above and also:

- Satisfy the acceptable outcomes identified in Table 1, Column 2.

Table 1: Acceptable outcomes for particular development

¹⁶ The incentive policy currently does not apply to buildings less than three storeys.

¹⁷ For instance, Obtain a 5-star, ‘as built’ Green Star rating from the Green Building Council of Australia or obtain carbon neutral certification. See: : <https://www.brisbane.qld.gov.au/planning-and-building/urban-design-in-brisbane/design-strategy-and-guidelines/brisbane-green-buildings-incentive-policy>

¹⁸ See Queensland Development Code MPC 4.1 and 4.2.

Development up to five storeys	Development over five storeys/Greenfield development
<p>Sustainability</p> <ul style="list-style-type: none"> -Electric vehicle power points (minimum 15 amps) <p>Resilience (for dwellings at risk of flooding)</p> <ul style="list-style-type: none"> -Utilise flood resilient materials and design principles -Adopt a more risk adverse Annual Exceedance Probability (AEP) than otherwise required¹⁹ <p>Nature positive</p> <ul style="list-style-type: none"> - A minimum rear setback of 6 metres of porous ground for single dwellings and 12 metres of porous ground for dwellings 3 storeys or above²⁰ -Preserve mature native trees 	<p>Sustainability</p> <ul style="list-style-type: none"> -Follow 20 minute city design principles -Include community batteries and electric vehicle power points (minimum 15 amps) -Ensure public infrastructure is delivered before or at the same time as residential development -Facilitate active transport options -Actively integrate circular economy principles including re-use of demolition materials <p>Resilience</p> <ul style="list-style-type: none"> -Utilise flood resilient materials and design principles -Adopt a more risk adverse Annual Exceedance Probability (AEP) than otherwise required <p>Nature positive</p> <ul style="list-style-type: none"> - Ensure publicly accessible green spaces of at least 0.5–1 hectare within 300 metres’ linear distance of all homes (WHO: 2017). -Increase street tree plantings and preserve existing trees. -Biodiversity and carbon offsets – invested within the SEQ region - for all displaced vegetation - Preserve inter-urban greenspace

¹⁹ “[C]urrently nearly everywhere in Australia the 1% AEP event, or ‘1 in 100 year flood’, with an appropriate additional height (or freeboard) for buildings is designated as having an ‘acceptable’ risk for planning purposes, regardless of the potential consequences of the flood. There are often strong social and economic reasons for considering a higher standard than the 1% AEP flood. For example, in some locations flood levels associated with rarer floods are significantly higher and are likely to cause significant devastation; [inundation](#) of a particular location may have significant economic and social consequences for a much wider region.... London is moving to a planning level above the ‘1 in 500 year flood’ (0.2% AEP) for land adjoining the Thames estuary. Also, many parts of the Netherlands use planning levels above the ‘1 in 1000 year’ coastal flood event (0.1% AEP), because inundation of large, low lying areas would have major consequences.” See: <https://www.chiefscientist.qld.gov.au/publications/understanding-floods/chances-of-a-flood>

²⁰ The Queensland Development Code sets a minimum rear setback of 1.5 m for buildings up to 4.5m and 2m for buildings up to 7.5 m (QDC 1.2 MP 1.2, P2).