



3 March 2017

Draft South East Queensland Regional Plan feedback
Department of Infrastructure, Local Government and Planning
PO Box 15009
City East Qld 4000

Submitted via SEQRegionalPlan@dilgp.qld.gov.au

Dear Sir/Madam

SUBMISSION ON *ShapingSEQ*

At a glance:

The top three challenges facing greater Brisbane are affordability, transport and infrastructure. (If we (all) just focused on these 3 things alone, we'd make a huge difference to the City....)

We offer the following high priority suggestions for improving *ShapingSEQ*:

ShapingSEQ topic/aspect **Our HIGH PRIORITY suggestions for improvement**

Jobs numbers	People follow jobs, literally, and so knowing where the jobs are, and where they will go, and what they'll be should be a foundation for <i>ShapingSEQ</i> . We suggest that this be an important part of the Centres Working Group's work, and that this be recognised as a critical success factor in the monitoring of the implementation of <i>ShapingSEQ</i> .
The link to infrastructure	The Gold Coast has significant heavy and now light rail infrastructure. The Sunshine Coast has virtually nothing, yet is expected to take a significant share of future growth. We suggest some serious and targeted investment would be a significant implementation outcome.

ShapingSEQ **Our HIGH PRIORITY suggestions for improvement**
topic/aspect

	<p>We suggest this Plan could also be advocating (and promising?) much more forcefully for a world-class metro rail system to service the Brisbane metropolitan area.</p> <p>To be blunt, we suggest replacing well-meaning words and rhetoric with serious actions which include real and targeted investment in critical transport infrastructure is critical.</p>
<p>Implementation</p>	<p>The Delivery matrix has a number of measures still to be developed and there is really no accountability for following through many of these actions and for serious and accountable reporting.</p> <p>We suggest you get the accountability confirmed, and make it a cornerstone of <i>ShapingSEQ</i>.</p> <p>We also suggest that the nominated 5 year reviews of <i>ShapingSEQ</i> be enshrined as important deadlines to meet – along the lines of our future fixed parliamentary terms.</p> <p>We also suggest that just as modern Planning Schemes undergo a broad ranging suite of ongoing reviews and amendments (particularly in the first year or two of their implementation) that a similar rolling ‘<i>ShapingSEQ</i> Amendment’ process be an important part of the implementation and monitoring.</p>
<p>Reviewing the draft <i>ShapingSEQ</i></p>	<p>We are well aware that for you to act on some of our suggestions you’ll need to go back out to the relevant community and industry sectors and experts. The BDA has an enviable record in presenting and facilitating independent discourse. We would be happy to discuss how we might contribute to this re-engagement.</p>

Background on the BDA

For the last 60 years the Brisbane Development Association (BDA) has strived to be the most influential, independent and visionary voice for a better Brisbane.

We express this through forums and events; research, education and thought leadership; advocacy; making connections and facilitating networking; and also via awards and recognition. We proactively engage with a diverse planning/development and socio-economic dialogue about greater Brisbane, and the topics we showcase address gaps/issues in *creating a better Brisbane*.

Our vision for the greater Brisbane area is that it is the world's most liveable place. For examples of our activities and bone fides, go to our *2016 Year in Review* [here](#).

Our geographic scope covers much of what *ShapingSEQ* identifies as the Metro Sub-region.

The BDA is run by a Management Committee comprised of a diverse group of Brisbane's leaders, supported by an even wider range of businesses and community interests. The BDA's Management Committee is [here](#). Our Patron members are [here](#).

This submission has been generated by a select group of planning professionals, urban planners and urban designers from within the BDA:

- **Brendan Christou**, Chief Executive, The Royal National Agricultural and Industrial Association of Queensland (RNA), and President of the BDA
- **Dr Mike Gillen**, Practice Leader - Design + Planning, Queensland, AECOM, and a Vice President of the BDA
- **Ben Lyons**, Strategic Development Manager / Principal, Cardno, and Immediate Past President of the BDA
- **Mike Kerry**, Independent Urban Management Advisor
- **Mark Doonar**, Project Director, Urban Development, APP Corporation, and Executive Director of the BDA

The BDA's engagement on *ShapingSEQ*

Recently the BDA hosted **Stuart Moseley** and **Greg Vann** at one of our Patron Members' Briefings, to discuss *ShapingSEQ*.

To assist Stuart and Greg, we did a quick poll of our Patron Members and Management Committee members, asking them for their **top 3 challenges facing greater Brisbane**. Now what the sample may have lacked in size, it certainly made up for in quality and experience, and the overwhelmingly frequent responses were not unexpected, and, well, pretty obvious.....

The top three challenges facing greater Brisbane are affordability, transport and infrastructure.

(If we (all) just focused on these 3 things alone, we'd make a huge difference to the City....)

Our members expressed their concerns along the following lines:

The Top 3 challenges facing Brisbane	Examples of what our members said ...
Affordability	<ul style="list-style-type: none"> – <i>Housing diversity and affordability. Good locations are tightly held and sparingly redeveloped despite zoning . This pushes up demand and in turn value.</i> – <i>Attainable housing supply – by re-introducing a serious program of public housing supply, well-designed and well located, without any of the stigma of past public housing estates and programs. Use this to promote strong themes of quality sub-tropical design, instead of producing yet another set of design guidelines.</i> – <i>The draft Plan acknowledges what it calls the “missing middle” in relation to housing form and choice – referring</i>



The Top 3 challenges facing Brisbane	Examples of what our members said ...
Transport	<p><i>to the middle suburbs.</i></p> <ul style="list-style-type: none"> – <i>Inclusivity - fostering the creation of 'complete communities' by creating neighbourhoods (housing, infrastructure / jobs) accessible every member of society irrespective of race, age, disability, gender or sexual orientation</i> – <i>Decreasing reliance on private transport</i> – <i>Provision of infrastructure, particularly public transport, to keep up with the rate of growth. Our public transit systems are by no means 'new world city' standard.</i> – <i>Replacing constant words and rhetoric with serious actions which include real and targeted investment in critical transport infrastructure. In particular we need a world-class metro rail network - not just bits and pieces. Yes, this is expensive, but it is about having priorities and creating the right and honest conversations with the community.</i> – <i>Transport to allow high speed connectivity of which a tolled autobahn with no speed limit, like in Germany, from Byron to NOOSA, and west to the appropriate population centres. Also, a sensible public transport system.</i>
Infrastructure	<ul style="list-style-type: none"> – <i>Infrastructure connectivity: connecting people, places & freight via improved transport systems</i> – <i>Provision of infrastructure, particularly public transport, to keep up with the rate of growth. Our public transit systems are by no means 'new world city' standard.</i> – <i>Implement a region-wide program of works, implemented by local authorities but funded in partnership, to create really great public spaces, tree lined road reserves, great parks and ensure a strong sub-tropical theme of shade</i>

The Top 3 challenges facing Brisbane	Examples of what our members said ...
	<i>and colour.</i>

Other challenges which also got a run, and are worth a nod are:

Challenges that are also important	Examples of what our members said ...
Jobs	<ul style="list-style-type: none"> – <i>Employment drives growth and it's not readily apparent what the region will offer in the future, other than a long commute from every direction into the Brisbane CBD.</i> – <i>Inclusivity - fostering the creation of 'complete communities' by creating neighbourhoods (housing, infrastructure / jobs) accessible every member of society irrespective of race, age, disability, gender or sexual orientation</i>
Trees, urban spaces	<ul style="list-style-type: none"> – <i>Trees: expressed as tree cover, attractive urban spaces and parks, tree-lined blvds, sub-tropical themes, greenbelts, and</i> – <i>Increasing tree cover/foliage to mitigate against rising temperatures, and to ensure we have places to sit and enjoy ourselves</i> – <i>Implement a region-wide program of works, implemented by local authorities but funded in partnership, to create really great public spaces, tree lined road reserves, great parks and ensure a strong sub-tropical theme of shade and colour.</i>
Ugliness and better	<ul style="list-style-type: none"> – <i>The rise of ugly buildings - can we influence/manage the design process better? Can we wield a big stick on those</i>



Challenges that are also important	Examples of what our members said ...
building/urban design	<p><i>that profit from ugly 50-100 year long blemishes on our city?</i></p> <ul style="list-style-type: none"><i>– Attainable housing supply – by re-introducing a serious program of public housing supply, well-designed and well located, without any of the stigma of past public housing estates and programs. Use this to promote strong themes of quality sub-tropical design, instead of producing yet another set of design guidelines.</i><i>– A city of cities philosophies, with green belts between cities/ villages , each with distinct character and pride</i>



Suggestions for improving *ShapingSEQ*

Overall this draft Plan is a great read.

We're not sure how the words about housing affordability, employment benchmarks and many other matters will be directly influenced by the Plan itself. There are many and complex competing forces and at the end of the day nothing speaks louder than actions - and the State Government still holds the key to many of these actions which can provide the leadership required.

Notwithstanding this, we offer the following suggestions for improving *ShapingSEQ*:

<i>ShapingSEQ</i> topic/aspect	Our suggestions for improvement
Vision, advocacy and the third edition	<ul style="list-style-type: none">– The Foreword is more political advocacy than serious planning commentary.– The Plan contains a lot of information. Unfortunately this tends to make the presentation very “busy” and not always easy to read.– This reads as the third iteration of the SEQ Plan, designed in 2004/05 for the fundamentals to be reviewed every 5 years and for there to be a close nexus with an infrastructure Plan and Program. The latter has been lost along the way, reducing the serious ability to influence the Plan’s intended outcomes by strategic infrastructure investment. The opportunity has also been overlooked to make this a “new look” approach to strategy development in an increasingly complex and unpredictable world. Instead, we have another look-alike document loaded with political promises and current planning jargon.– We suggest you strip out the political advocacy, and instead fearlessly address the complex and dynamic issues that are likely to beset the region over the next 0-10 years. We also suggest you tackle the landuse/transport link/dependencies head on.
Jobs numbers	<ul style="list-style-type: none">– <i>ShapingSEQ</i> purports to deal with key economic issues, but in reality (and to be blunt) it contains a Treasury table



**ShapingSEQ
topic/aspect**

Our suggestions for improvement

of future economic forecasts without any serious analysis or indication of how the Plan can and will deliver. Eg it tells us what we might expect – the main growth in jobs in the health, education and services sector. It does, however, indicate significant growth predictions in manufacturing with no analysis or strategy.

- *ShapingSEQ* can't be 'a little bit pregnant' on this centrepiece of planning for the region. Despite the spin on job numbers that gets published, there are fewer full time jobs, growing part time employment, and wages growth is not keeping pace with the cost of living. We suspect that the official unemployment figures are understating the proportion by a factor of 2 or maybe 3, meaning that the real 'underemployment' across the region might be as high as 20%.
- People follow jobs, literally, and so knowing where the jobs are, and where they will go, and what they'll be should be a foundation for *ShapingSEQ*. **We suggest** that this be an important part of the Centres Working Group's work, and that this be recognised as a critical success factor in the monitoring of the implementation of *ShapingSEQ*.

**Centres
hierarchy**

- The Draft Regional Plan's strategies to achieve efficient land use include planning for and accommodating the infill dwelling supply benchmarks through new development in the existing urban area, including redevelopment, with a focus on corridors and centres. Strategies also include focusing density with well-designed and increased residential densities in and around centres.
- It is clear that the Draft Regional Plan intends the network of centres to play an important role in the management of growth across the region. This approach represents sound planning policy and continues what was a key feature of the original SEQ Regional Plan in 2005.



ShapingSEQ topic/aspect	Our suggestions for improvement
	<ul style="list-style-type: none">– Despite the growth and change in the region in recent times and that which is forecast to 2041, the Draft Regional Plan adopts the 2005 Regional Activity Centres Network (RACN), with very little change. Furthermore, the draft Regional Plan acknowledges that a review of the RACN is necessary, but instead defers this review until after the draft Regional Plan has been finalised.– Given the significant contribution the RACN will have on shaping the future of development and growth in infill locations, we suggest that the RACN review be undertaken as a matter of urgency, prior to the draft Regional Plan being finalised. We also recommend that the composition of the proposed Centres Working Group include representatives from industry and community groups and the BDA would welcome the opportunity to participate in this forum.
25 year land supply	<ul style="list-style-type: none">– Land supply – 25 years anticipated supply within urban footprint. We understand that at all times SEQ Local Authorities are required to have at least 15 years supply zoned and ready for use. We suggest you explain how the 25 year land bank is expected to work and the robustness of the dwelling supply benchmarks. (BTW, Is a benchmark the same as target?)– Is it practical to try for a “one-size-fits-all” approach where every local authority has a numeric benchmark? We suggest you consider having clear principles to be applied to all Planning Schemes which will accommodate a range of market responses and demands, then and let the market decide the exact locations.– Potential future growth areas – These are OK as a concept, but these open up expectations which may be hard to manage. We suggest LGA’s could make a recommendation to the Minister for extensions of the Urban Footprint (perhaps where, for example, the Planning Scheme has already foreshadowed the future



**ShapingSEQ
topic/aspect**

Our suggestions for improvement

development potential of an area outside the Urban Footprint).

- Will there soon be a time when we have to start thinking of more radical alternatives to the traditional incremental spread? We think so, and **we suggest** this should be canvassed (at least) by the Plan.

**The link to
infrastructure**

- It is unfortunate there is still no clear nexus between the plan, its priority intents and a clear infrastructure plan and program for SEQ. The Sub-regional narratives and growth patterns contain many existing and proposed pieces of infrastructure, but no strong strategy or commitment for future investment. A good example is the Northern Sub-region; with a population of around 350,000 and an anticipated additional 200,000+. It is a substantial urban area which is very poorly serviced by public transport infrastructure. Past plans have promoted growth in the west of the greater Brisbane area and resulted in substantial new road and rail transport. As a result, Springfield and Ripley are now flourishing.
- The Gold Coast has significant heavy and now light rail infrastructure. The Sunshine Coast has virtually nothing, yet is expected to take a significant share of future growth. **We suggest** some serious and targeted investment would be a significant implementation outcome.
- **We suggest** this Plan could also be advocating (and promising?) much more forcefully for a world-class metro rail system to service the Brisbane metropolitan area. The Plan gives it all a mention, but with no obvious link to an infrastructure program. Statements such as the need for “*a more concerted approach to integrating transport infrastructure with complementary land use and densities*” are just stating the obvious (planners have been saying this for decades!) without a clear pathway of actions and commitments.

<i>ShapingSEQ</i> topic/aspect	Our suggestions for improvement
	<ul style="list-style-type: none"> – To be blunt, we suggest replacing constant words and rhetoric with serious actions which include real and targeted investment in critical transport infrastructure is critical. In particular we need a world-class metro rail network – not just bits and pieces. Yes, this is expensive, but it is about having priorities and creating the right and honest conversations with the community.
Housing	<ul style="list-style-type: none"> – We suggest a focus for <i>ShapingSEQ</i> should be the re-introduction of a serious program of public housing supply, well-designed and well located, without any of the stigma of past public housing estates and programs. We suggest this ought to be used to promote strong themes of quality sub-tropical design, instead of producing yet another set of design guidelines. – We are well aware the Minister for Housing has a Housing Strategy for the State almost ready for Cabinet approval, but we are unaware of the detail. We suggest that <i>ShapingSEQ</i> ought to be synced with the Strategy (or at be across enough of the detail so that both are companion state planning instruments).
Design	<ul style="list-style-type: none"> – Promoting good design is a great piece of advocacy. How will <i>ShapingSEQ</i> influence this in practice? The quality and standard of multi-unit buildings needs to improve drastically, but this will require a level of intervention by Councils not yet seen or deemed acceptable. We have prepared Sub-tropical design manuals before and preparing more design guides is just more process rather than positively influencing outcomes. – The unaffordability of housing for most people lays bare the reality that it's 'housing is for profit, not housing for housing'. Whilst this is not unique to the region, we have to proactively change the view away from houses being just financial commodities to a far loftier view that house are homes for people. – We suggest one part of the answer is how they're



<i>ShapingSEQ</i> topic/aspect	Our suggestions for improvement
	<p>designed. There a numerous design guidelines that can be applied across greater Brisbane to good effect. But they have little or no teeth, and <i>ShapingSEQ</i> should empower the relevant jurisdictions to mandate a far higher level of good design.</p>
Implementation	<ul style="list-style-type: none">– Implementation/delivery remains somewhat short and unconvincing. There appears to be more “planning to plan”. Clear and concise action pathways and commitments are not in evidence in the Plan at present. Measuring the successful implementation of the plan through a comprehensive monitoring process will, if undertaken prescriptively and with accountability for limited action/performance, promote confidence in the enactment of the plan’s strategies. This also moves closer to a plan, monitor and manage process as opposed to predict and provide.– The Delivery matrix has a number of measures still to be developed and there is really no accountability for following through many of these actions and for serious and accountable reporting.– We suggest you get this right, and make it a cornerstone of the <i>ShapingSEQ</i>.– We also suggest that the nominated 5 year reviews of Shaping SEQ be enshrined as important deadlines to meet – along the lines of our future fixed parliamentary terms.– We also suggest that just as modern Planning Schemes undergo a broad ranging suite of reviews and amendments (particularly in the first year or two of their implementation) that a similar ‘<i>ShapingSEQ</i> Amendment’ process be an important part of the implementation and monitoring.

Finally

We are well aware that for you to act on some of **our suggestions** you'll need to go back out to the relevant community and industry sectors and experts. The BDA has an enviable record in presenting and facilitating independent discourse. Take a look at the highly relevant range of topics we covered during 2015 [here](#), and 2016 [here](#). We would be happy to discuss how we might contribute to this re-engagement.

Thanks for the opportunity to comment and make suggestions on how to improve *ShapingSEQ*. We congratulate all who have got it to this point and encourage you all to take a deep breath, and keep going.

Yours faithfully

On behalf of the BRISBANE DEVELOPMENT ASSOCIATION

A handwritten signature in black ink, appearing to read "Mark Doonar".

Mark Doonar

Executive Director