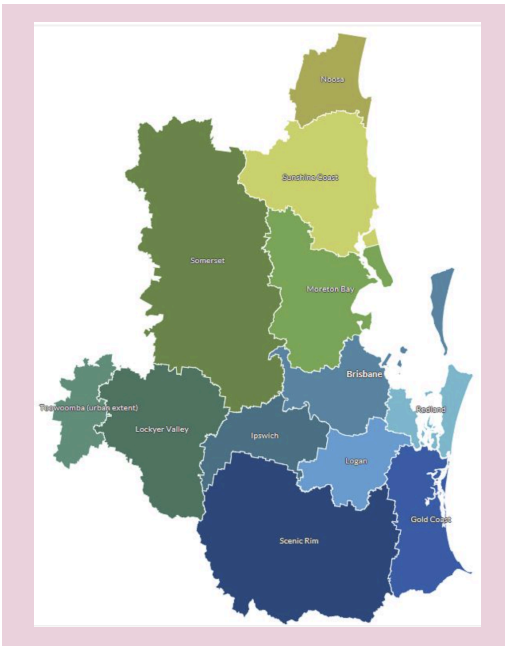


# Request for Evidence to Demonstrate and Support the Governance Mechanisms for SEQ Regional Planning.

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*As a result, social polarisation and inequality can be exacerbated as profitable locations across cities are regenerated, often forcing low- and moderate-income citizens out, while other parts remain largely ignored. Yet, urban regeneration also offers a set of opportunities and innovations, as new development addresses concerns around housing supply, infrastructure delivery and environmental sustainability. However, the capacity to realise these opportunities are often constrained by policy, governance, and funding arrangements, as well as wider market conditions.<sup>1</sup>*

## Introduction

The level of rigour and evidence being applied to regional planning is out of sync with the scale of its impact on the electorate. This has serious long term implications for all Queenslanders.

This submission seeks your early consideration of our following concerns -

1. The lack of a single economic model/forecast that provides the foundation for the SEQ regional plan and the related infrastructure plan
2. The lack of any explanation of the most basic mechanism being used to balance growth, sustainability and equity. One of the local authority areas covered by this plan [out of the 12 LGAs] will house more than 50% of Queensland population in the not too distant future and some of the planning for this region does not satisfy some of the most basic demands of a contemporary western parliamentary democracy.

We will use the following more detailed points to highlight the major issues at stake. There is

3. A lack of detail / evidence provided in the recent SEQ Draft Update 2023 to support the intended expansion of industrial land allocations within the region and the modified regulations intended to enable industrial land protection and expansion
4. An ethical imbalance in the manner the SEQ plan is treating industrial land compared to both residential and rural land [especially in regard to food production].
5. A lack of rigour being employed by the SEQ regional plan to monitor and report actual land use using standardised land use categories and the annual updating of land use monitoring to measure the 'actual' shifts compared to the invisible performance of the urban and rural footprints.

[The complete lack of 'budget vs actual' reporting [in relation to land use] does not accord with the level of risk and exposure accruing to the most populous area in Queensland. The appalling failures of reporting over the last few years put the integrity of SEQ government at risk and whilst some problems have been recognised there is still no evidence of accountability consistent with the otherwise high standards required by the Queensland Parliament for program accountability. Actual land use is by its very nature at the core of understanding the performance of the SEQ Regional Plan.]

## Rationale

The planning process in SEQ is openly being directed towards what is regarded as 'metropolitan regionalism'<sup>2</sup>: we are witnessing the whole area meld into a vast interconnected network which necessitates a multiplicity of 'regulatory agendas, governance recalibrations and institutional

<sup>1</sup>Kristian Ruming, Urban Regeneration and the Australian City, in Urban Regeneration in Australia (Policies, Processes and Projects of Contemporary Urban Change, Ed. Kristian Ruming, Routledge, London, 2018, p1

<sup>2</sup>Neil Brenner, New Urban Spaces (Urban Theory and the Scale Question) Oxford University Press, New York, 2019, p209

reconfigurations'<sup>3</sup>. Based on other like developments we are strongly of the view that this should involve modified jurisdictional boundaries, the establishment of intermunicipal agencies, administrative districts and or planning bodies<sup>4</sup>. We are seeing the introduction of some regulatory measures by higher levels of government, to regulate urban expansion [both the State and Commonwealth have expanded their urban/regional reach in recent years and we can now see a variety of quasi-mechanisms intended to enhance interorganizational and public-private coordination.

The management measures for business as usual [BAU], major events [Olympics], major funding arrangements [City Deal] as well as the SEQ Regional Plan are good examples of these new [potentially 'half-baked'] governance arrangements means that project outcomes, community visibility and transparency of results are all at risk. Experience in other regions is that this rescaled formation of urban governance is more directly oriented toward establishing 'supranational and transversal linkages that are intended to propel SEQ's 'metropolitan region' upwards within the urban hierarchy'<sup>5</sup>.

An emergent regulatory architecture has the potential, through time, to transfer significant decision-making capacities regarding urban planning, infrastructure investment, and land use to certain [privileged] corporate actors, including transnational firms, banks, property developers and property consultancies<sup>6</sup>. We are already seeing early signs of this within the context of the current SEQ regional update planning. With the overwhelming issue of housing [availability and affordability] colliding with 'city deal' promoted population expansion as well as major event demands and environmental threats [from reduced biodiversity and increased climate impacts] there is a very strong case for the need of much more deliberative and direct community involvement, connection and understanding to ensure that some of the clear mistakes of the past [and the clear and present obvious risks to our future] are avoided<sup>7</sup>.

Evidence indicates that it not just important from the point of view of exercising democratic aspirations but it is probably more important from a business, economic and financial perspective: regions like SEQ must operate in a smart way and to do so, communities need to be smarter[ than before] to preserve 'place' and at the same time preserve value and competitiveness for the entire region. If communities do not become engaged, then the intensification project has the potential to accelerate a trajectory towards the 'bottom' and this then puts the economic viability of the region at risk of not being able to sustain and develop its soft and hard infrastructures.

Arrangements up to now have been massively inadequate and submissions received as part of the 'update' planning will have attested to this. The update itself recognises this but we reiterate - there is no evidence to indicate that the planning vehicle administered by State Planning has any apparent capacity to actually ensure the implementation of an appropriate governance framework with appropriate transparency and reporting capacities.

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<sup>3</sup> Ibid

<sup>4</sup> Ibid

<sup>5</sup> Ibid

<sup>6</sup> Ibid p.144

<sup>7</sup> The failure to have a town plan for Brisbane for more than 40 years and the absence of community engagement over long periods are just examples of the historical reasons SEQ is where it is today. The incapacity of the State Government and the BCC to develop cohesive trajectories that deliver equitable results for constituents is reflected in the many performance outcomes that remain unreported by current planning measures.

This submission sets out our understanding of the **current situation** followed by **our request in regard to each of the numbered items above.**

Appropriate governance can only start from where it is now and that being the case, the current measures are proven to be inadequate and the proposed plan offers almost no material improvement to deal with the highlighted issues. Action is required by your good offices now, to enable the new plan to be any chance of delivering on its promises.

## CURRENT SITUATION: ITEMS ONE AND TWO

1. The lack of a single economic model/forecast that provides the foundation for the SEQ regional plan and the related infrastructure plan
2. The lack of any explanation of the most basic mechanism being used to balance growth, sustainability and equity. One of the local authority areas covered by this plan [out of the 12 LGAs] will house more than 50% of Queensland population in the not too distant future and some of the planning for this region does not satisfy some of the most basic demands of a contemporary western parliamentary democracy.

# Governance

## Implementation process

The successful delivery of the goals, elements, and strategies in the draft ShapingSEQ 2023 Update is heavily dependent on providing assurance to all stakeholders that actions will be delivered, tools and mechanisms to allow for implementation are available and accessible and that stakeholders will be held to account. It is acknowledged that the draft ShapingSEQ 2023 Update cannot be 'set and forget' and to provide true assurance, will require shorter, sharper review periods and dynamic interventions along the way in direct response to evidence.

To refocus on key priorities, and to streamline delivery pathways, the draft ShapingSEQ 2023 Update includes clear strategies and implementation actions for key parties including state and local governments as articulated in *Chapter 3, Part A*. This new integrated format defines accountable action owners aligned with revised policy directions, provides clarity to stakeholders on immediate tasks for implementation and sets out key milestones for delivery and reporting.

Actions for state and local governments are drafted to be clear as to what is required by delivery partners for their completion, with particular emphasis on immediate priorities. This limits any ambiguity and provides a clear and coordinated approach to achieving the policy intent within the draft ShapingSEQ 2023 Update.

The implementation process maintains the core elements of the existing *ShapingSEQ 2017* implementation program: implementation actions, timeframes, delivery mechanisms, stakeholder responsibility, and measures for ongoing monitoring. However, there are key amendments to the implementation process to provide greater assurance, which include:

### » Change control measures

Integrating a change control process that allows implementation to address and actively respond to changes that occur within the life of the plan. This may be in response to baseline data and evidence, changes to policy direction based on emerging priorities, and/or performance in relation to targets. This allows for a dynamic implementation plan that is responsive to an evolving region and its changing priorities and facilitates direct action of relevant stakeholders in response to evidence where and when required.

### » Decision making triggers

#### Decision-making point 1

» integrating and modernising improved and regular and transparent tracking of performance and progress against policy intent (including dwelling supply targets), timeframes and measures.

» identification of performance indicators where responses or intervention may be required due to anticipated progress not being made (in a timely manner) or where key indicators are showing non-preferred trends

» triggers built into the process that notify a potential decision-making point. Subsequent decision, assurance and risk review is undertaken and may result in changes to the implementation action or delivery pathway and/or trigger direct site-based interventions (such as an intervention by GAT or EDQ).

### Decision-making point 2

» through implementation of the plan, there may be external changes and disruptors that are reactive and require immediate intervention. Disruptors may include but are not limited to natural hazard events or crisis, major shifts in policy or priorities, or significant new evidence used to inform policy or targets

» this would trigger a decision-making point, assurance and risk review, and may result in changes to the implementation action or delivery pathway or in some cases may be significant enough to trigger a regional plan update or review.

Implementation of the revised strategies in the draft ShapingSEQ 2023 Update is dependent on a collective commitment from state and local governments, Traditional Owners and industry to be accountable for their ongoing delivery.

The delivery of *ShapingSEQ 2017* over the last six years has been limited by a lack of coordinated activity and committed action across all entities. These limitations have informed a necessary review of existing governance arrangements to ensure that going forward there is joint accountability, strategic alignment across government bodies, and to provide greater clarity regarding roles and responsibilities for community and stakeholders.

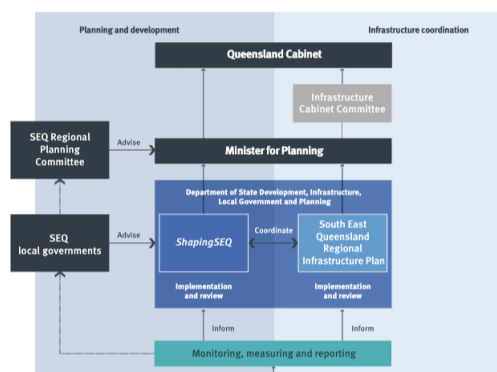
The delivery of draft ShapingSEQ 2023 Update will be supported by the Queensland Government with dedicated resourcing to drive this change in practice and ensure accountability in its delivery through refreshed governance arrangements.

A key focus of this refinement is to enhance communication of advice and recommendations from experts to decision makers, including the Minister for Planning and Minister for Housing.

The revised governance framework for the delivery of the draft ShapingSEQ 2023 Update includes:

- » clear delineation of advisory bodies from decision making bodies
- » streamlined communication channels for advice and recommendations
- » advancing the current and previously used arrangements within the Regional Planning Committee (RPC)

- » a Project Control Group (PCG) that coordinates internal (state departments) and external (local governments, industry etc.) working groups, providing finalised recommendations to decision makers
- » inclusion of First Nations people in governance on decisions impacting their rights to determine outcomes that impact their lands and waters
- » additional specialised working groups that can change based on regional priorities and clarity of roles for decision makers and advisory bodies.



# Implementation assurance

A key outcome sought from the draft ShapingSEQ 2023 Update is implementation assurance. Implementation assurance ensures accountability for stakeholders while identifying potential risks in delivery and associated mitigation measures.

The draft ShapingSEQ 2023 Update therefore establishes a new implementation assurance framework and process that is:

## 1 > Dynamic

integrating measures to improve the capacity to adjust and respond to changing priorities, evolving needs or crisis scenarios

## 2 > Accountable

sharing responsibility and commitment to deliver outcomes, supplemented by ongoing monitoring

## 3 > Transparent

sharing of evidence and information, access to data and ongoing monitoring and reporting to reflect implementation progress

## 4 > Effective

assurance that the implementation actions will be delivered by leveraging off a suite of mechanisms available to stakeholders to achieve envisioned outcomes

### Implementation framework

The draft ShapingSEQ 2023 Update is underpinned by new data sets and methodologies, including updated population projections and integrated land use and transport modelling. This robust evidence base leaves the plan well-placed to respond to the region's key priorities and challenges, deliver regionally beneficial outcomes and achieve the 50 year vision.

However, a common challenge with regional plans, is the translation from policy to implementation.

The successful delivery of the goals, elements, and strategies in the draft ShapingSEQ 2023 Update is therefore heavily dependent on an updated and refined implementation framework that provides assurance to local and state governments, industry and the community.

As such, the enhanced implementation framework has been developed to ensure policy directions can be delivered with sufficient transparency, accountability, and resources, providing greater clarity and certainty to stakeholders.

The implementation framework (Figure 11) incorporates:

- » the five themes at its core – Grow, Prosper, Connect, Sustain and Live. These themes are supported by revised elements and strategies and supplemented with key actions for stakeholders
- » the implementation process which details the mechanisms for delivery, timeframes, roles and responsibilities, ongoing monitoring and measures
- » governance, assurance and risk, which clarifies the roles and responsibilities for decision makers and advisors to improve implementation assurance and manage ongoing risk

- » a change control process, that enables the plan to address non-preferred trends or respond to other changes and disruptors
- » ongoing monitoring that signals delayed delivery of implementation actions or where key indicators are showing non-preferred trends.

Assurance ensures accountability and covers the identification of risk, plus the evaluation of opportunities and actions being undertaken to realise benefits on behalf of the region.

A key component of providing assurance for the draft ShapingSEQ 2023 Update is the inclusion of change control measures that are linked to ongoing monitoring and that ultimately trigger key decision-making points for intervention. Including these triggers and decision-making pivot points result in a more dynamic implementation framework, that is not only responsive to an evolving region and changing priorities but allows for rapid action or intervention when required.



Figure 11: Implementation assurance framework

The above graphics are from the draft SEQ plan. Further, we note that page 112 of the SEQ Update 2023 says *“that the SEQ economy operates as a single economic system and therefore planning .....land in SEQ must respond with a regional approach”*. It is a given, by virtue of the aspirations set out throughout the whole update plan that this ‘single economic system’ needs to have locally coordinated ‘determined-equilibriums’ between GROWTH, SUSTAINABILITY AND EQUITY.

Whilst the current and proposed SEQ plans boast far more ambitious outcomes - by this we note that both current and future SEQ plans in fact propose to achieve what is now regarded as a ‘net gains sustainable development’[NGSD]; which is far more ambitious than maintaining ‘determined-equilibriums’- both plans promise enhanced governance, management and reporting [for example pages 238-241 of the current plan refer].

In spite of the eloquent prognostications contained within the draft plan there is NO EVIDENCE OR REFERENCE to

- A single economic model/forecast that provides the foundation for the SEQ regional plan and the related infrastructure plan
- The specific method that will be employed to achieve an ongoing awareness of the balance between growth, sustainability and equity

At the moment it appears that there is not even the slightest idea as to how the managers of this plan would know or understand whether we are balancing growth, sustainability and equity so as to achieve the plan's outcomes. The graphics from the draft plan [see above] reflect a series of postulations for which the evidence is non-existent.

## OUR REQUEST

We seek -

- Access to the single economic model being employed for the SEQ plan or at least a professional explanation of the core components of the model.
- The specific method and measures that would enable the monitoring of a determined equilibrium between growth, sustainability and equity. Surely the SEQ Regional Plan is at least a 'program' in the Queensland parliamentary reporting framework? We anticipate a program level of accountability to the parliament - See [Program and Project Assurance](#)

Without either one of these items the SEQ Plan becomes a political gesture rather than a plan. We seek the actual evidence that illustrates how this plan is being 'governed' so as to achieve the promises set out for this single economic system of SEQ. It is and has proven to be unproductive to provide speculative diagrams or gestural wording [as illustrated by sections in both current and draft plans for SEQ] - we seek a standard evidentiary framework for the SEQ Regional Plan program!

The evidence we are seeking is that which is available for all other primary functions performed by governments across Australia and the Queensland Parliament. ***We want a clear set of documents like those that cover all of the core programs administered by the Queensland Government.***

At the moment however, regional planning in Queensland appears to be a complete 'black box' decorated with cliches and gestures pointing towards an unreal future. It would seem likely that unless plans such as for SEQ are properly informed to deliver a pathway for 'determined-equilibriums' as noted above, the plans are most likely to be accelerating us towards a future determined by 'squeaky wheels' and 'vested interests'.



## CURRENT SITUATION:ITEM THREE

3. *A lack of detail / evidence provided in the recent SEQ Draft Update 2023 to support the intended expansion of industrial land allocations within the region and the modified regulations intended to enable industrial land protection and expansion*

The evidence presented in the updated plan [i.e. NONE!] would be comical if it wasn't so serious. The plan itself commends that we should do more planning [and that admonition comes after more than 20 years of regional planning] and we are surprised to learn that the SEQ planners are concerned that

costs may rise for industrial land. [From where and what sources has this startling insight been garnered and why is it focused only for industrial land?].

This is in a context that residential UN-affordability has gone up by a factor of more than 200% during the course of this plan but that doesn't appear to have been similarly reported. Further, at the same time the urban footprint is being expanded, the industrial footprint is proposing to be expanded - maybe we need more land [in globo] in SEQ to cater for all this growth! *[We are mindful of course that the SEQ planners refuse to*

*sustain accurate information and record actual land use data for use within the SEQ Regional plan.]*

We are very surprised by the new concern for industrial land prices and we are very concerned about the lack of clear information regarding 'actual' land use data being made available. At the same time we do not understand why land prices for future industrial land would be worthy of note without reference to other significant land uses being considered in a similar vein.

Moving on, the plan identifies several strategies for industrial land. See pages 18-19, 41, 92-93, 112-115,193. *[Remarkable that a complex planning document provides no 'cross-referencing' in regard to how to find material on a single 'major' topic area.]* Amongst other issues, the plan prioritises

### Industrial land

The intent of ensuring there is sufficient industrial land to accommodate projected demand will be implemented by planning for new industrial areas. Detailed planning will be prioritised for these future industrial areas in the Metro sub-region:

1. Part of the land within the Southern Thornlands Urban Footprint expansion area will provide for a major new employment area to accommodate a mix of business and industrial uses within Redland LGA with good arterial road access, which ultimately accesses the SEQ strategic freight network via the Gateway Motorway, as well as direct access to the Capalaba Principal Regional Activity Centre.
2. Urban Footprint expansion area at Redland Bay is an area that will contribute to industrial land supply in the Redland LGA. This area represents a logical expansion of an existing industrial area, and residential development is not supported in this area.
3. Additional areas for industrial development at Narangba East to meet local industrial land demand.

### An evolution in industrial land planning

ShapingSEQ has traditionally played the role of identifying key industrial areas for the region (such as MEIAs) and enabling local planning for industrial land to meet local demand. The draft ShapingSEQ 2023 Update has identified some localised areas of SEQ that require additional industrial land to meet the projected demand to 2046. In response, draft ShapingSEQ 2023 Update identifies future industrial land in the LGAs of Redland, Sunshine Coast and Gold Coast.

In addition to this traditional role of the regional plan, the draft ShapingSEQ 2023 Update has an increased focus on industrial land, recognising the need for a strategic region-wide industrial land strategy for SEQ. As the region grows, current projections show the future supply of industrial land in the Brisbane LGA becoming exhausted within the life of the plan – as soon as the 10–15 year horizon. Despite intensification of use of industrial areas being a key objective of industrial land planning within Brisbane LGA, there remains only a finite supply of industrial land in Brisbane. Over time, as Brisbane's industrial land is taken up, industrial land prices will rise which will cause an incremental redistribution of industrial activities with larger footprints outside of Brisbane. This will also naturally occur for freight and logistics operators who typically aim to be on the urban fringe to facilitate breaking of bulk freight prior to areas of urban congestion.

Excess demand out of Brisbane by 2046 is estimated to range from 500 hectares up to greater than 1500 hectares. The freight and logistics network of SEQ sees its regional focus skew south and west in response to significant freight volumes originating from or being destined to the southern states. This indicates that the local government areas of Gold Coast, Ipswich and Logan are all likely to play key roles in meeting future industrial land demand diverted from Brisbane.

However, it is acknowledged that this is additional demand to that which has previously been projected for these LGAs.

How this regional demand is accommodated will depend on a variety of factors including the market and infrastructure. While some businesses will prefer to locate in a particular area for their own reasons be it supply chain, workforce origin, branding, or other factors, infrastructure servicing is also an issue that needs a coordinated approach across state and local governments.

The supply constraints and growing demand for industrial land across the region highlight the need for land use planning to adequately consider and protect established and often hard to locate industrial uses from encroaching urban development. This principle is required to provide certainty to those established industrial uses for future investment in their assets and ongoing future operations. This is critical in MEIAs across SEQ including the Australia TradeCoast which has recently been under pressure from encroaching incompatible uses.

There are ambitious targets for SEQ under the Queensland Waste Management and Resource Recovery Strategy to increase diversion of waste from landfill and increase recycling – including to achieve 85 per cent waste diversion from landfill and 70 per cent recycling rates across all waste types by 2040. Waste operations in SEQ are relatively significant in comparison to other regions. SEQ accounts for 77 per cent of Queensland's total waste, producing approximately 7,200,00 tonnes per year. Currently only 58 per cent of that waste is being recovered, with construction and demolition recovery leading the way in waste recovery, followed by commercial and industrial waste and municipal solid waste.

Industrial land will also play an important role in Queensland's waste, resource recovery and recycling task – through REPs. REPs are places that transform and remanufacture recovered materials into new products with a commercial value. When established, these precincts aim to generate new jobs, increase investment in research and development, encourage positive environmental outcomes, support a transition to a low carbon future, and support the creation of sustainable markets for remanufactured end products.

This plan establishes a strategy to ensure that SEQ is well positioned to benefit from and maximise the projected employment growth into the future, and to have industrial land available to achieve the target of the *Queensland Waste Management and Resource Recovery Strategy*.



detailed planning for future industrial areas in the Metro sub-region, such as the Southern Thornlands Urban Footprint expansion area, to accommodate projected demand for industrial land.

### Industrial land strategy



**SEQ is approaching a tipping point in terms of supply of industrial land, with key areas of the region approaching a critical shortfall of industrial land within the life of this plan, and as early as a ten year horizon. Industrial land demand within SEQ is anticipated to increase by around 60 per cent based on 2016 figures, representing demand for almost 5,000 hectares of additional industrial land.**

Forecast industrial land supply shortfalls in Brisbane will result in increased land prices, leading to new businesses choosing to locate outside of Brisbane, and existing lower value, land expansive industrial uses seeking to relocate out of Brisbane. This will impact the ability for projected employment increases for Brisbane to materialise and will result in industrial uses being accommodated in neighbouring local government areas.

In response, the draft ShapingSEQ 2023 Update establishes a regional approach to industrial land planning. This will complement industrial land planning that already occurs at the local government level and represents the next evolution in industrial land planning in circumstances where local industrial land planning alone cannot address the issues or make the most of the opportunities presented at the regional scale.

The draft ShapingSEQ 2023 Update recognises the important role of a regional industrial land strategy that leverages the competitive strengths of the region's industries and supports the growth of high value sectors and mix of supporting land uses in RECs. It seeks to safeguard strategic industrial locations to ensure an ongoing supply of industrial land over the next 25 years, noting that each MEIA within SEQ fulfills a different role and function depending on the markets they serve and the strategic location within the broader freight network.

The draft ShapingSEQ 2023 Update aims to preserve and protect existing industrial land in RECs and MEIAs. It guides compatible development around industrial areas so as not to jeopardise the future development and operation of critical industrial land uses within RECs and MEIAs.

Industrial land will also play an important role in Queensland's waste, resource recovery and recycling task with the intent of achieving 85 per cent waste diversion from landfill and 70 per cent recycling rates across all waste types by 2040<sup>1</sup>. Waste operations in SEQ are relatively significant in comparison to other regions, accounting for 77 per cent of Queensland's total waste, with only 58 per cent of that waste currently being recovered.

Acknowledging the range of opportunities and challenges in achieving waste diversion targets, the draft ShapingSEQ 2023 Update supports priority investigations into locations for REPs for SEQ. REPs will work together with RECs, MEIAs and State Development Areas (SDAs) as a broader economic system for the region to enable continued growth of the SEQ economy.

Further, the plan also

- recognizes the need to protect established and often hard-to-locate industrial uses from encroaching urban development to provide certainty for future investment in their assets and ongoing operations.

- encourages the intensification of existing industrial areas to make more efficient use of land and infrastructure

- promotes the redevelopment of underutilised or contaminated sites for industrial use to reduce pressure on greenfield land

Overall, the plan emphasises the need for a coordinated and strategic approach to

industrial land use planning to ensure that sufficient industrial land is available to support economic growth and job creation in the region! [Ah!] - What has SEQ Regional Plan been doing for 25 years? We thought the stats produced by the regional planning process looked very sound for industrial land. Were they all wrong?

Further, the plan outlines several strategies to protect existing industrial land use from encroaching urban development. These include:

- strategic industrial areas that are critical to the region's economic growth and job creation and seeks to protect them from incompatible land uses
- intensification of existing industrial areas to make more efficient use of land and infrastructure, which can reduce the pressure to convert industrial land to other uses
- redevelopment of underutilised or contaminated sites for industrial use, which can reduce the need to convert greenfield land to industrial use
- coordinated and strategic approach to land use planning to ensure that industrial land is not lost to incompatible uses

Overall, the plan recognizes the importance of protecting existing industrial land uses from encroaching urban development to ensure that sufficient industrial land is available to support economic growth and job creation in the region. As well, the plan identifies several legislative changes, initiatives, and programs to support and protect industrial land. These include:

The specific locational requirements for MEIAs – near existing or planned freight and supply chain networks, including intermodal terminals, where they can accommodate regionally or state significant agglomerations of industry and business activity – makes identifying new areas difficult.

The overarching principle of the strategies in the draft ShapingSEQ 2023 Update is to protect the land within existing MEIAs for medium-high impact industrial uses. Their operation into the future must be protected from encroachment by incompatible uses. Furthermore, no land within any MEIAs should be converted to residential uses other than those uses which facilitate the operation of the MEIA (e.g. caretakers residence, worker quarters, etc).

Local planning should enable the intensification and expansion of MEIAs so they can fulfil their ultimate role in the regional economy.

Development within MEIAs areas must be consistent with their regional role and function.

The commitment to developing a regional industrial land framework has been established through draft ShapingSEQ 2023 Update to provide a strategic approach to industrial land planning in SEQ. The industrial land framework sets out the process by which the Queensland Government will monitor industrial land supply within SEQ, and plan for growth within existing or new MEIAs through infrastructure investment and prioritisation.

However, given that the impacts of the exhaustion of industrial land supply in Brisbane are expected to be felt within 5-10 years, a targeted response must be prioritised. Gold Coast, Logan and Ipswich LGAs are the key focus areas for this issue given the location of the existing and planned freight and logistics networks that are located in the south and south-western corridors.

The following actions are prioritised through the draft ShapingSEQ 2023 Update to ensure the timely provision of regional industrial land:

- 1 Identification of additional industrial land within northern Gold Coast
- 2 Infrastructure investment within Logan to provide improved freight accessibility to Park Ridge MEIA and Crestmead/Berrinba MEIA
- 3 Investigation of potential additional industrial land within Logan within the South Logan PFGA
- 4 Infrastructure investment within Ipswich LGA to service industrial land located at Ebenezer

### Industrial land for Recycling Enterprise Precincts (REP)

Some of SEQs industrial areas will contribute to specific priorities for the region such as REP.

Development and operation of a recycling enterprise precinct provides opportunity for sustainable economic development based on use and reuse of materials that would otherwise be discarded to landfill. The co-location of complementary industry activities can develop places that contribute to a circular economy.

The identification of likely locations for REPs is underpinned by an examination of economic impacts, social impact, environmental impact, amenity impact and the efficiency of land and infrastructure use. The objectives of the location of these precincts focus on economic development opportunities, the co-location of industries, maximising sustainability outcomes, minimising environmental impacts, creating quality industrial places and developing quality infrastructure.

The Queensland REP Location Strategy identifies two types of precincts, namely:

- Prepare precincts:** consolidation locations for waste that can be recycled or transformed. These precincts can leverage off existing waste and resource recovery centres
- Transform precincts:** large scale locations where waste is recycled or transformed. These would need to be specialised locations with adequate buffering from other urban uses.

The development of REPs is likely to occur through actions of local governments, industry and the Queensland Government and while the location of REPs relies on the availability of suitably zoned land, there are other factors which will determine appropriate locations and timing of future development. Port of Brisbane, Bromelton and Wellcamp are indicative sites that have been identified based on analysis of opportunities and will progress as the market takes up those opportunities. Further sites for future investigation have been identified at Caloundra, Willowbank and Stapylton.

### Actions for state and local government Industrial land

In partnership with local government, the Queensland Government will establish a regional industrial land framework to monitor industrial land supply, project industrial land demand, and respond to projected regional industrial land demand in SEQ.

The strategy will articulate the role and function for MEIAs and industrial land in RECs in recognition of their place in regional, national and international supply chains.

Through the regional industrial land framework, state and local government will undertake a more detailed assessment of the industrial land supply-demand outlook in Brisbane, Gold Coast, Logan and Ipswich, and to investigate the ability of land already designated to be appropriately serviced and made accessible to meet future demand pressures.

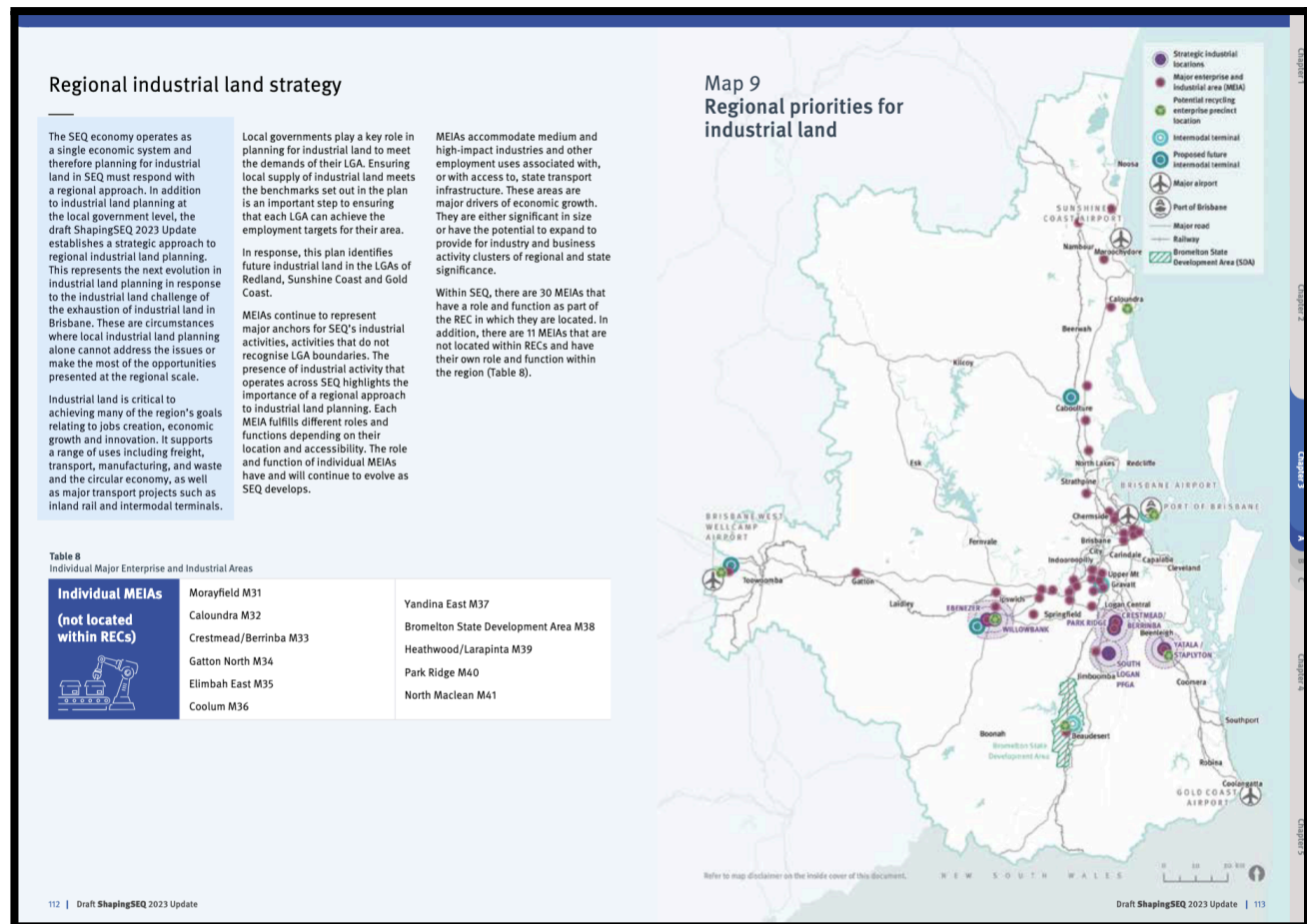


- **Legislative changes to support implementation assurance:** The plan proposes legislative changes to support the implementation of the plan's policies and ensure that they are effectively delivered
- **Strengthened planning and protection for Major Enterprise and Industrial Areas (MEIAs):** The plan seeks to strengthen planning and protection for MEIAs across SEQ to ensure an ongoing supply of industrial land over the next 25 years

As well, the plan recognizes the need for a range of regulatory and policy measures to support and protect industrial land in the region. The plan notes that South East Queensland is projected to experience significant population and employment growth over the next 25 years, which will increase demand for industrial land to support economic growth and job creation. At the same time, urban development pressures are increasing, which can lead to the loss of industrial land to other uses. The plan also recognizes the importance of protecting established and often hard-to-locate industrial uses from encroaching urban development to provide certainty for future investment in their assets and ongoing operations. Overall, the plan emphasises the need for a coordinated and strategic approach to industrial land use planning to ensure that sufficient industrial land is available to support economic growth and job creation in the region. These issues are recognised by this submission.

## OUR REQUEST

- On the basis that the existing SEQ plan has been tracking data on industrial land since 2017 and none of this material surfaced in reporting up to the end of last year!. When and how did all this [lack of supply] happen without SEQ regional planners knowing? We therefore seek specific



EVIDENCE of the information that has been uncovered. The community has not been consulted or alerted to this issue. The evidence we seek only involves simple supply and demand information that supports this whole tranche of 'reforms' in relation to industrial land.

- What is the difference in methodology being employed between residential, industrial and rural [food production] demand and supply analysis and planning? How do these methods relate to /connect with the single economic model for the region?
- Why does the update plan only reference land value [as a specific planning issue] in relation to industrial land? **The lack of transparency and apparent inconsistency does point towards the lack of a comprehensive regional planning model. It also points towards a model developed on the basis of 'squeaky wheels' as opposed to planning foresight and completeness.**

## CURRENT SITUATION:ITEM FOUR

- *An ethical imbalance in the manner the SEQ plan is treating industrial land compared to both residential and rural land [especially in regard to food production].*

**The update plan does not provide specific information on the additional land required for food production given the increase in population!** However, the plan does recognize the importance of protecting the region's agricultural land resources to preserve long-term food security and export opportunities [page 205]. This appears to be a somewhat shallow aspiration because what we know is that we are expanding residential land, we are expanding industrial land - so unless the SEQ region is getting fatter [sic!], rural land must be decreasing? **The update plan does not provide specific information on this issue!**

The plan also notes that opportunities exist to further grow and diversify the regional food system, which has seen a range of direct marketing and value-adding options emerge for small to mid-scale primary producers and food processors. Overall, the plan emphasises the need for a coordinated and strategic approach to land use planning to ensure that agricultural land is protected and that sufficient land is available to support the region's food system.

| Rural prosperity  |  |   |
|---|--|---|
| <p>The sub-region's principal agricultural land resources in Eumundi–Yandina, Beerwah, Palmwoods, Mary Valley and the Glass House Mountains will be protected to preserve long-term food security and export opportunities. This includes preventing further land fragmentation and protecting agricultural activities from encroachment by incompatible uses.</p> <p>Alternative agricultural futures will be explored to help coastal lowland areas transition from traditional cane farming. This includes diversifying rural activities to strengthen resilience to market cycles and climate change.</p> | <p>Opportunities exist to further grow and diversify the regional food system which has seen a range of direct marketing and value-adding options emerge for small to mid-scale primary producers and food processors. Adaptation of traditional industries and the entry of new players has seen the region become the centre of locally branded and artisanal food and beverage production.</p> <p>Local farmers' markets, restaurants and consumers are increasing the demand for the range of locally produced higher value dairy products, grass fed and free range meats, subtropical fruits, vegetables, nuts and niche products that now augment the well-established exports of processed ginger and herbs.</p> | <p>The sub-region's hinterland areas support the growth of creative and boutique industries. Rural diversification includes value-adding, nature-based tourism and agri-tourism as well as clean energy initiatives. These activities will be encouraged where they can be managed to preserve agricultural productivity, conservation assets and the surrounding character and scenic amenity.</p> |

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The update plan does include some policies and initiatives to support and protect rural land [but this constitutes a very very light-touch approach and they do not appear to specifically deal with food security issues]. For example, the plan seeks to prevent further land fragmentation and protect agricultural activities from encroachment by incompatible uses. However, at page 247 the plan says that



## Planning Regulation 2017 and SEQ regulatory provisions

The Planning Regulation 2017 (Planning Regulation) has been in effect since 2 June 2017. Regulatory provisions associated with ShapingSEQ (SEQ regulatory provisions) apply to the following areas in the region:

- » RLRPA
- » RLA
- » SEQ development areas.

The SEQ regulatory provisions play a crucial role in ensuring the ShapingSEQ policy is delivered through the development assessment process. They are also used in the preparation or amendment of local government planning instruments, such as planning schemes, ensuring alignment of levels of assessment.

Findings from targeted stakeholder consultation have deemed comprehensive amendments to the SEQ regulatory provisions unnecessary.

However, some amendments to the regulatory provisions are required to ensure that development does not result in further undesired land fragmentation and sprawl, contrary to ShapingSEQ policy direction and strategies. Additional feedback has emphasised the significance of small-scale adjustments to policy settings to support rural towns and villages. Consequently, the provisions concerning rural precincts these areas will be reviewed to facilitate the sustainable growth of these locations.

Regulatory provisions for SEQ Development Areas (Schedule 10, Part 15) will require an amendment to support the designation of additional Major Development Areas identified within the draft ShapingSEQ 2023 Update. This section is also to be updated to include assessment of MEIAs. These locations were introduced in *ShapingSEQ 2017* and additional protection measures to support their contribution to the regional economy are sought through the draft ShapingSEQ 2023 Update.

Refer to ShapingSEQ 2023 Update Regulation Amendment Consultation Paper for further information.

findings from **targeted stakeholder consultation** have deemed **comprehensive amendments to the SEQ regulatory provisions unnecessary!** This would be of considerable interest to hundreds of thousands of urban dwellers who were not directly asked about their views on the need for 'amendments to the SEQ regulations' prior to presentation of the draft plan. This smacks of a bias that sees the SEQ planning method based on dipping its fountain pen into the well of public engagement when it needs to continue writing the 'script-of-least-resistance'.

This smacks of what previous research has suggested[in specific reference to residential land use issues] about the results arising from SEQ planning methods being - '**clean money - dirty system**'. In this case [relating to land use for food

production] there appears to be an approach that has invisibly de-prioritised the value, costs and employment issues related to food production land compared to industrial land. At the same time as not properly assessing comparative risks and without recognising the need to balance all of the factors that make up an agreed balance between growth, sustainability and equity.

The plan also recognizes the importance of supporting rural towns and villages through small-scale adjustments to policy settings. Additionally, the plan proposes to review the provisions concerning rural precincts to facilitate the sustainable growth of these locations. It appears that this 'light-touch' will make it easier for land use to be more residentially focused as opposed to thinking about food security [and not thinking fully about the expansion of food supply to cater for a growing population].

## OUR REQUEST

- What is the method used to forecast food production land requirements so as to formulate the demand side of the food production land component of the SEQ region. Or is it assumed that we will always be able to get more food from another 'region'?

- Why is food production land use being treated differently on multiple fronts - land use, regulation etc. - to other land uses? Or to put it another way, why is industrial land use being treated with such priority [compared to food production]? What is the evidence for this approach?
- What is the method used to actually measure food production output in the region?
- What arrangements are in place to regularly measure the location and extent of land being used for food production?

## CURRENT SITUATION:ITEM FIVE

- *A lack of rigour being employed by the SEQ regional plan to monitor and report actual land use using standardised land use categories and the annual updating of land use monitoring to measure the 'actual' shifts compared to the invisible performance of the urban and rural footprints.*

*[The complete lack of 'budget vs actual' reporting [in relation to land use] does not accord with the level of risk and exposure accruing to the most populous area in Queensland. The appalling failures of reporting over the last few years put the integrity of SEQ governance at risk and whilst some problems have been recognised there is still no evidence of accountability consistent with the otherwise high standards required by the Queensland Parliament for program accountability. Actual land use is by its very nature at the core of understanding the performance of the SEQ Regional Plan.]*

Each of the preceding areas of concern have raised an underlying problem that goes to the very heart of accountability in relation to the SEQ regional plan. That issue put simply is that governance cannot proceed effectively in the absence of a standard - 'budget VS actual' reporting. SEQ regional plan HAS NONE! At the heart of this absence is 'land use' data. As financial plans require \$budget VS \$actual reporting, regional plans require 'land use [by categories]budget VS land use [by categories] actual'.

The next issue comes about by virtue of the regional plan requiring the achievement of a balance between GROWTH, SUSTAINABILITY AND EQUITY. There is no evidence in the existing or draft plans how a program such as a 'regional plan' is monitored. At the highest level of reporting GDP, Biodiversity, Carbon and Median income relative to Median Home Prices are fundamental. We don't see any evidence of this information being collected or reviewed by SEQ governance mechanisms. How do you ensure an outcome consistent with a plan, without this overarching data?

## OUR REQUEST

Establish and report on the progress of the regional plan ANNUALLY, against

- Land use categories
- GDP, Biodiversity, Carbon and Median income relative to Median Home Prices



## Summary

In the context of the major challenges of housing, climate change, biodiversity, social quality of life and equity [just to name a few!], we fully support effective planning regulation, economic coordination and staggered development as the right strategies. The evidence available to our community at the present time is that during the upcoming planning period for the SEQ regional plan, our 'single economic system' will move further away from [as opposed to getting any closer to] either 'net gain sustainable development' or 'carbon zero' targets.

We therefore respectfully ask for EVIDENCE [not aspirations or good intentions] from the Minister's planning team because, in spite of eloquent prognostications contained within planning documents, there is NO EVIDENCE OR REFERENCES TO AN OPERATIONAL CAPACITY FOR GOVERNANCE ACROSS THE REGION - only aspirations that have failed to deliver for many years now.

Our requests are set out in full in the following table and are presented in the full knowledge that the task at hand for the planning team is both difficult and comprehensive.

## TABLE OF REQUESTS

### TO THE MINISTER FOR PLANNING FOR THE SEQ REGIONAL PLAN

We seek by way of evidence, the following items -

- Access to the single economic model being employed for the SEQ plan or at least a professional explanation of the core components of the model.
- The specific method and measures that would enable the monitoring of a determined equilibrium between growth, sustainability and equity. Surely the SEQ Regional Plan is at least a 'program' in the Queensland parliamentary reporting framework? We anticipate a program level of accountability to the parliament - See [Program and Project Assurance](#)
- On the basis that the existing SEQ plan has been tracking data on industrial land since 2017 and none of this material surfaced in reporting up to the end of last year!. When and how did all this [lack of supply] happen without SEQ regional planners knowing? We therefore seek specific EVIDENCE of the information that has been uncovered. The community has not been consulted or alerted to this issue. The evidence we seek only involves simple supply and demand information that supports this whole tranche of 'reforms' in relation to industrial land.
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Establish and report on the progress of the regional plan ANNUALLY, against

- Land use categories
- GDP, Biodiversity, Carbon and Median income relative to Median Home Prices