

BRU's SUBMISSION

in Response to
the Commonwealth Government's
DRAFT NATIONAL URBAN POLICY

*Prepared by Dr Neil Peach, Project Coordinator
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Brisbane Residents United [BRU], on behalf of the community acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians. We recognise their cultures, histories and diversity and their deep connection to the lands, waters and seas of Queensland and the Torres Strait.

We acknowledge the Jagera people and the Turrbal people as the Traditional Custodians of Meanjin (Brisbane), the lands on which our submission has been prepared as well as the lands referred to in this submission. We pay our respects to Jagera and Turrbal Elders past, present and emerging.

The primary purpose of this report is to better understand how to protect the people and landscapes within the area known as South East Queensland [SEQ] and also within Brisbane City Council's Local Government Area. We present this report in an endeavour to heighten the Commonwealth Government's awareness that its involvement in urban policy comes with a heavy responsibility to ensure that its framework is clear enough and has sufficient capacity to ensure that State and Local Government are not enabled to pursue inadequate actions under the imprimatur of the Commonwealth [when such Commonwealth policies are no more than an open door invitation to doing 'more of the same'].

We have seen the previous City Deal structure be used for this very purpose. At the highest level, the major failure of this current proposal is the failure to ensure the complete integration of 'bioregional planning' with 'regional planning'. Given the significant impact that the Government's Nature Positive Plan is intended to have, it is untenable that there are not specific and direct connections in this policy to that initiative.



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EXECUTIVE SUMMARY

We commend the Commonwealth and its officers for developing and presenting this proposal.

We appreciate the opportunity to present our submission for your consideration

We have and are dealing with significant urban issues within SEQ and Brisbane

We ask that you consider several submissions which we have made in the last two years that go to the very issues considered within this draft policy. These submissions bring to bear a wide range of specific issues that are impeding optimal urban development in our region. Links to these submissions are set out in Attachment 2. Please review these submissions as they provide critical information to inform this draft policy.

We ask that you give high order priority to expanding your policy in the following key areas -

- The need to specifically link this policy to the Nature Positive Plan so that bio regional planning and regional planning are regarded as integrated elements of urban planning
- The need to shift the emphasis of Commonwealth Policy to support decentralisation of development. The sustainability and productivity of cities and our regions depends on the need to shift the avalanche of investment in areas such as SEQ [where infrastructure spending is likely to exceed \$120billion over the life of the existing regional plan].
- These first two issues bring to bear the fact that Urban Policy is meaningless without a direct connection to immigration and the environment. The Policy must require this nexus so as to enable it to be operationalised across the country.
- There must be recognition that the benefits of densification will not be appropriately achieved without this policy sanctioning the need to invest in the 'missing middle' across all major urban areas. The stupidity of the current focus in SEQ [and other growth areas] on High Density Hubs and Single Dwelling Suburbs is causing the relocation of tens of thousands of families to suboptimal 'greenfield' subdivisions well away from the core cities. The missing middle and/or 'gentle density' would deliver much needed supply at lower cost and build local sustainability.
- The need to ensure that all avenues of money laundering are applied to the real estate, property development and legal areas is fundamental to ensuring that flexibility of supply and demand factors in both the commercial and housing sector is not impeded by factors outside ordinary controls.

The next section [2] sets out the questions we have 'asked' of this policy. Attachment 1 sets out the answers gleaned from the documentation. Section [3] then identifies what we regard as shortcomings.

In all cases we have kept our commentary very brief as we have had a very limited time to prepare this submission.

KEY QUESTIONS

1. Are there any specific recommendations or strategies proposed in the document to address urban challenges in Australia?
2. Does the document provide any information on how this policy will be implemented?
3. Does the policy indicate its connection with the nature positive plan relating to regional planning?
4. Does the policy indicate ways of overcoming the supply chain issues associated with high density development in all cities of Australia?
5. Does the policy indicate mechanisms for decentralising urban growth to regional centres?
6. Does the document deal with the enormous transfer of wealth that arises to property owners when governments rezone land to high density development.
7. Does the document identify the measures needed to ensure cities reduce their contributions to greenhouse gas emissions?
8. Does the policy indicate the specific mechanisms intended to be employed to meet zero emissions targets?
9. Are there any mechanisms in place to assess or review conformance and performance of cities?
10. Does the policy identify the need to enforce money laundering actions in regard to real estate, law and development sectors in Australian cities?
11. Does the policy deal with the dissemination of information to the community and the need for regional community centric data portals to enable communities to actively engage in 'smart cities' development?
12. Does the policy consider the need to develop creativity and innovation in cities and to build a circular economy that allows Australian cities to become centres for creative economies that are not dependent on other countries for their key intellectual infrastructure?
13. To what extent does the policy seek to overcome the problem that it is the very nature of high density development in Australia that is a major contributor to housing affordability?
14. Does the policy know what the nature of the 'reforms' are that will solve the affordability problem?

CONCLUSIONS AND REQUEST FOR CHANGES

We ask that you give high order priority to expanding your policy in the following key areas -

- The need to specifically link this policy to the Nature Positive Plan so that bio regional planning and regional planning are regarded as integrated elements of urban planning
- The need to shift the emphasis of Commonwealth Policy to support decentralisation of development. The sustainability and productivity of cities and our regions depends on the need to shift the avalanche of investment in areas such as SEQ [where infrastructure spending is likely to exceed \$120billion over the life of the existing regional plan].
- These first two issues bring to bear the fact that Urban Policy is meaningless without a direct connection to immigration and the environment. The Policy must require this nexus so as to enable it to be operationalised across the country.
- There must be recognition that the benefits of densification will not be appropriately achieved without this policy sanctioning the need to invest in the 'missing middle' across all major urban areas. The stupidity of the current focus in SEQ [and other growth areas] on High Density Hubs and Single Dwelling Suburbs is causing the relocation of tens of thousands of families to suboptimal 'greenfield' subdivisions well away from the core cities. The missing middle and/or 'gentle density' would deliver much needed supply at lower cost and build local sustainability.

The need to ensure that all avenues of money laundering are applied to the real estate, property development and legal areas is fundamental to ensuring that flexibility of supply and demand factors in both the commercial and housing sector is not impeded by factors outside ordinary controls.

Here are the questions with a brief comment in regard to shortcomings and issues we have found in the draft policy.

1. Are there any specific recommendations or strategies proposed in the document to address urban challenges in Australia?

The policy assumes that we continue to densify urban areas - one city in Queensland will soon populate more than 50% of Queensland's people. This is neither effective or efficient - the policy must press for decentralisation.

2. Does the document provide any information on how this policy will be implemented?

We acknowledge the efforts being made here. However, they are in essence exacerbating the problem because much of the housing supply issues are now controlled by major inner city developers or broadacre developers. They have no interest in price reductions in their assets. The policy must prompt and promote the 'missing middle' that could deliver considerable advancements in supply.

3. Does the policy indicate its connection with the natural positive plan relating to regional planning?

That there is no direct and specific alignment of [NPP] policy is a matter of bureaucratic discomfort exercising control over what is in the best interests of the community.

4. Does the policy indicate ways of overcoming the supply chain issues associated with high density development in all cities of Australia?

This section of the policy has no measures or mechanisms to force a shift in thinking and action. It just keeps repeating the mantra of 'we need more houses'.

5. Does the policy indicate mechanisms for decentralising urban growth to regional centres?

The policy is very weak and has no practical ways of enhancing a more diverse, decentralised and creative Australia.

6. Does the document deal with the enormous transfer of wealth that arises to property owners when governments rezone land to high density development.?

The policy does not endeavour to deal with the reality of the market - it is ironic that environmental policy is now engaging with market mechanisms but urban policy just turns a blind eye and fosters 'the game of mates'.

7. Does the document identify the measures needed to ensure cities reduce their contributions to greenhouse gas emissions?

We support the idea of measuring but what checks and balances are in place to underwrite progress. 'Performance based planning' is now eating its own tail with concessions provided to developers now outweighing the putative benefits from green certifications.

8. Does the policy indicate the specific mechanisms intended to be employed to meet zero emissions targets?

There are some broad scale measures but in reality - the measures that matter are being left to the lower levels of government to administer.

9. Are there any mechanisms in place to assess or review conformance and performance of cities?

Unless the Commonwealth is able to show some 'teeth' [as is now happening with the thrust of environmental legislation] then these matters will be overcome by the States and LGAs. This does not mean legislation is necessary but that funding [sticks and carrots] must be employed.

10. Does the policy identify the need to enforce money laundering actions in regard to real estate, law and development sectors in Australian cities?

This issue must be addressed at a Commonwealth level and be recognised as something that underwrites the capacity for urban policies to make a real difference.

11. Does the policy deal with the dissemination of information to the community and the need for regional community centric data portals to enable communities to actively engage in 'smart cities' development?

There must be investment in community data portals to engage and equip residents to become informed advocates.

12. Does the policy consider the need to develop creativity and innovation in cities and to build a circular economy that allows Australian cities to become centres for creative economies that are not dependent on other countries for their key intellectual infrastructure?

There is a compelling need to develop strong mandated connections between academia, business, government and community in developing entrepreneurial approaches towards a much greater circular economy.

13. To what extent does the policy seek to overcome the problem that it is the very nature of high density development in Australia that is a major contributor to housing affordability?

There has previously been much recognition of 'value capture' in regard to urban planning by governments. Yet there are no mechanisms to capture [at least a percentage] of the billions of dollars being transferred to private hands through government decisions on upzoning.

14. Does the policy know what the nature of the 'reforms' are that will solve the affordability problem?

The policy has no specific approaches other than to keep on expecting someone else to solve the problem. This policy is part of that 'polishing the problem' approach when agencies are unable to either understand and/or deal with the issue.

We appreciate your consideration of these issues. We look forward to your advice on changes made as a result of community consultation.

ATTACHMENT 1

RESPONSE TO KEY QUESTIONS

Are there any specific recommendations or strategies proposed in the document to address urban challenges in Australia?

The document provides several recommendations and strategies to address urban challenges in Australia. Here are some key points:

1. **Housing Supply and Affordability:** The National Housing Accord aims to build 1.2 million new well-located homes over five years starting from July 2024. Initiatives such as the Housing Support Program, New Homes Bonus, and Social Housing Accelerator payment are being implemented to support states and territories in achieving this target. Additionally, the National Planning Reform Blueprint outlines measures to improve housing supply through planning, zoning, and land release [22](#).
2. **Equitable Urban Areas:** To create equitable urban areas where everyone feels safe and secure, access to housing, infrastructure, education, and jobs is essential. Initiatives are needed to increase housing supply, improve access to affordable housing, and invest in transport and social infrastructure. Densification and infill development are also highlighted as strategies to increase sustainability [21](#).
3. **Health and Wellbeing:** The Infrastructure Investment Program focuses on investing in faster, more affordable, and more accessible public transport and active transport in areas with concentrated employment opportunities. The National Health and Climate Strategy addresses health impacts of climate change and aims to reduce greenhouse gas emissions from the Australian health system [53](#).
4. **Productivity:** The National Freight and Supply Chain Strategy sets out a national vision for freight systems and supply chains that contribute to a strong and prosperous Australia. The Australian Universities Accord aims to improve higher education opportunities and outcomes for under-represented cohorts, addressing barriers associated with access, affordability, participation, success, and attainment [55](#).

These recommendations and strategies aim to tackle various urban challenges in Australia, including housing affordability, equitable access to services, health impacts of climate change, and enhancing productivity in urban areas.

Does the document provide any information on how this policy will be implemented?

The document provides insights into how the National Urban Policy will be implemented through various initiatives and frameworks. Here are some key points regarding the implementation:

1. **National Housing Accord:** The National Housing Accord commits to building 1.2 million new well-located homes over five years starting from 2024. This initiative involves collaboration between the Australian Government, states, territories, local

government, institutional investors, and the construction sector to achieve the ambitious housing target ⁴⁹.

2. **Social Housing Accelerator:** The Social Housing Accelerator aims to deliver thousands of new social homes across Australia, thereby increasing housing supply for individuals on social housing waiting lists. This initiative is part of the broader effort to address housing affordability and accessibility issues ⁴⁹.
3. **Home Guarantee Scheme:** The Home Guarantee Scheme supports eligible home buyers in purchasing a home sooner through reduced deposit requirements. This scheme is designed to facilitate homeownership and improve access to housing for individuals seeking to enter the property market ⁴⁹.
4. **National Housing Infrastructure Facility:** The National Housing Infrastructure Facility provides financing for eligible housing projects, enabling critical infrastructure developments that unlock new housing supply, particularly in the social and affordable housing sectors. This initiative aims to address infrastructure gaps and support the construction of new housing stock ⁴⁹.
5. **Housing Australia Future Fund:** The Housing Australia Future Fund, legislated in September 2023, allocates \$10 billion to build 30,000 new social and affordable housing properties in its first five years. This fund is a significant investment in addressing housing affordability and increasing the supply of social and affordable housing across Australia ⁴⁹.

These initiatives and funds demonstrate the concrete steps being taken to implement the National Urban Policy and address urban challenges in Australia. The collaborative approach involving various stakeholders and the allocation of resources highlight the commitment to achieving the policy objectives outlined in the document.

Does the policy indicate its connection with the nature positive plan relating to regional planning?

The document does not explicitly mention a "nature positive plan" in relation to regional planning. However, it does emphasise the importance of sustainable and environmentally regenerative urban development. The focus on creating connected, environmentally sustainable urban precincts and neighbourhoods suggests a commitment to promoting nature-positive practices within urban areas ⁴¹.

While the specific term "nature positive plan" may not be used in the document, the overarching goals of creating sustainable, green, and resilient urban environments align with the principles of nature-positive planning. By emphasising master-planning to ensure environmentally regenerative urban spaces, the policy indirectly addresses the need for nature-positive approaches in regional planning.

In summary, while the document does not explicitly reference a nature-positive plan in relation to regional planning, its emphasis on environmentally sustainable urban development indicates a commitment to incorporating nature-positive principles in the planning and development of urban areas.

Does the policy indicate ways of overcoming the supply chain issues associated with high density development in all cities of Australia?

The document does not explicitly mention specific strategies for overcoming supply chain issues associated with high-density development in all cities of Australia. However, it does

highlight the importance of sustainable urban development, infrastructure planning, and addressing challenges related to urban growth.

Here are some key points from the document that indirectly relate to supply chain issues in high-density development:

1. **Infrastructure Investment:** The Infrastructure Investment Program focuses on investing in faster, more affordable, and more accessible public transport and active transport in areas with concentrated employment opportunities. This initiative aims to improve connectivity and accessibility within urban areas, which can indirectly impact supply chain efficiency [41](#).
2. **National Freight and Supply Chain Strategy:** While not directly related to high-density development, the National Freight and Supply Chain Strategy sets out a national vision for freight systems and supply chains that contribute to a strong and prosperous Australia. This strategy may have implications for addressing supply chain issues in urban areas, including those with high-density development [33](#).
3. **Urban Planning Challenges:** The document acknowledges the challenges associated with urban development patterns, including continued outward growth contributing to sustainability concerns, increased greenhouse gas emissions, and greater infrastructure investment needs. Addressing these challenges through sustainable urban planning and development strategies may indirectly impact supply chain issues in high-density urban areas [22](#).

While the document does not provide specific strategies for overcoming supply chain issues in high-density development, the broader focus on sustainable urban development, infrastructure investment, and urban planning challenges suggests a recognition of the importance of efficient supply chains in supporting urban growth and development in Australian cities.

Does the policy indicate mechanisms for decentralising urban growth to regional centres?

The document discusses the importance of regional development and the connection between cities and regions in Australia. While it does not provide explicit mechanisms for decentralising urban growth to regional centres, it emphasises the significance of supporting sustainable growth in both cities and regions. Here are some key points related to regional development:

1. **Regional Investment Framework:** The Regional Investment Framework outlines the Australian Government's approach to supporting strong, stable, and sustainable regions across the country. It emphasises the need for diversified investments across people, places, services, industries, and local economies to respond to diverse opportunities and challenges in regional Australia. This framework aims to place regions and their people at the centre of decision-making and coordinate investments across governments to support sustainable growth [11](#).
2. **Regional Connectivity:** The document highlights the importance of improving regional connectivity through efficient transport networks and expanded telecommunications connectivity. By enhancing connections between regional areas and urban centres, the policy aims to support regional development and economic growth [36](#).

3. **Regional Planning Considerations:** While the document primarily focuses on urban challenges and policies, it acknowledges the interdependence between cities and regions. It suggests that sustainable urban development should consider the broader regional context and the need to support regional centres in addition to urban areas. This recognition of the interconnectedness between cities and regions implies a holistic approach to planning that considers decentralisation of growth to regional centres³⁶.

In summary, while the document does not provide specific mechanisms for decentralising urban growth to regional centres, it underscores the importance of regional development, connectivity, and sustainable growth across both urban and regional areas. The Regional Investment Framework and the emphasis on regional connectivity suggest a commitment to supporting regional centres and promoting balanced growth between cities and regions in Australia.

Does the document deal with the enormous transfer of wealth that arises to property owners when governments rezone land to high density development.

The document does not explicitly address the issue of the transfer of wealth to property owners when governments rezone land for high-density development. However, it does emphasise the importance of sustainable urban planning, community engagement, and transparent decision-making processes in urban development.

Here are some key points from the document that indirectly relate to the issue of wealth transfer in rezoning for high-density development:

1. **Transparent Decision-Making:** The document highlights the importance of transparency and shared accountability in urban planning processes. It emphasises the need for informed decision-making and meaningful engagement with local communities, industry, academia, and other stakeholders. Transparent decision-making processes can help ensure that rezoning decisions are made in the public interest and consider the broader impacts on the community⁴⁰.
2. **Place-Based Approach:** The document advocates for a place-based approach to urban development that delivers shared value through meaningful engagement with local communities. By involving stakeholders in the planning and design process, there is an opportunity to address concerns related to wealth transfer and ensure that development benefits the community as a whole⁴⁰.
3. **National Urban Policy Principles:** The principles outlined in the document, such as creating high-quality compact urban spaces and prioritising future urban investment within existing urban footprints, aim to guide decision-making in urban development. These principles can influence how rezoning decisions are made and help mitigate potential issues related to wealth transfer⁴⁰.

While the document does not specifically address the issue of wealth transfer in rezoning for high-density development, its focus on transparent decision-making, community engagement, and sustainable urban planning principles suggests a commitment to ensuring that urban development benefits the broader community and is carried out in a responsible and inclusive manner.

Does the document acknowledge or identify the need for a gentle density approach across wide areas of suburbia in order to contribute to the housing shortage?

The document acknowledges the need for a diverse range of housing options and emphasises the importance of sustainable and inclusive urban development. While it does not explicitly mention a "gentle density approach" across wide areas of suburbia, it does highlight the significance of increasing housing supply, improving housing affordability, and promoting diverse housing types to address the housing shortage in Australia.

Here are some key points from the document that indirectly relate to the concept of gentle density and its potential contribution to addressing the housing shortage:

1. **Housing Affordability:** The document recognizes the challenges of housing affordability in Australia and the need to provide affordable housing options for all segments of the population. It emphasises strategies to address housing affordability, reduce homelessness, and ensure that urban development benefits all members of the community. Promoting diverse housing types, including gentle density approaches, can contribute to increasing housing supply and affordability ⁴².
2. **National Housing Accord:** The National Housing Accord aims to build 1.2 million new well-located homes over five years to address housing challenges in Australia. This initiative includes measures to improve housing supply, support sustainable development, and enhance housing affordability. Implementing a mix of housing types, including gentle density options, can help meet the housing demand and provide more choices for residents ²².
3. **Urban Development Principles:** The document emphasises the importance of urban areas that prioritise an adequate standard of living, quality of life, and accessibility and affordability of housing for all. By promoting sustainable and inclusive urban development, which may include gentle density approaches, the policy aims to address housing shortages and create more livable communities ⁴¹.

While the document does not explicitly use the term "gentle density approach," its focus on housing affordability, diverse housing options, and sustainable urban development aligns with the principles of gentle density as a strategy to increase housing supply and promote inclusive communities. By encouraging a mix of housing types and densities, including gentle density solutions, the policy aims to contribute to addressing the housing shortage in Australia.

Does the document identify the measures needed to ensure cities reduce their contributions to greenhouse gas emissions?

Yes, the document outlines various measures and strategies aimed at reducing cities' contributions to greenhouse gas emissions and combating climate change. Here are some key points from the document related to this topic:

1. **Transition to Zero Emissions:** The document emphasises the importance of transitioning urban areas to zero emissions by 2050. It highlights the need for modal shifts to public and active transport, reducing household energy use, and adopting sustainable building materials to lower emissions in cities. Coordinated leadership from government and industry is identified as crucial for effective climate action in cities ³¹.
2. **Sustainability Initiatives:** The document suggests investing in sustainability initiatives to mitigate the impacts of rising sea levels, coastal erosion, flooding, bushfires, and heat hazards. It promotes active and public transport, energy

efficiency improvements, circular economy initiatives, nature-based solutions, green spaces, and green infrastructure to reduce greenhouse gas emissions and improve environmental sustainability ³³.

3. **Climate Action in Urban Areas:** The document acknowledges the pivotal role of urban areas in combating climate change. It calls for changes in systems and regulations to incentivize innovative responses and achieve zero emissions. Promoting sustainable transport, improving building energy performance, and adopting low-emission technologies are highlighted as key strategies for reducing urban emissions and supporting climate action ³¹.
4. **Promotion of Sustainable Transport:** The document underscores the importance of sustainable transport options, such as active travel, public transport, and electric vehicles, in reducing transport emissions and improving air quality. Establishing mode share targets and encouraging cleaner transport modes are identified as essential strategies for achieving urban emissions reduction targets ³¹.

Overall, the document provides a comprehensive framework for addressing greenhouse gas emissions in urban areas by promoting sustainable practices, investing in green infrastructure, and fostering collaboration between government, industry, and communities to achieve zero emissions and combat climate change.

Does the policy indicate the specific mechanisms intended to be employed to meet zero emissions targets?

The policy document provides insights into specific mechanisms and initiatives intended to be employed to meet zero emissions targets in urban areas. Here are some key mechanisms outlined in the document:

1. **Net Zero Economy Authority:** The establishment of the Net Zero Economy Authority is highlighted as a mechanism to promote a positive net-zero economic transformation as the world decarbonises. This authority aims to provide certainty through long-term policy and drive investments in low-emissions and renewable technologies ⁵¹.
2. **Transport and Infrastructure Net Zero Roadmap and Action Plan:** This initiative is designed to explore potential pathways to reduce greenhouse gas emissions to net zero by 2050 across all transport modes, including road, aviation, maritime, and rail. It also focuses on freight and supply chains, active transport planning, and supporting infrastructure to achieve zero emissions in the transport sector ⁵¹.
3. **National Electric Vehicle Strategy:** The strategy provides a nationally consistent framework to increase the uptake of electric vehicles in the road transport sector. By promoting electric vehicles, the strategy aims to reduce emissions and improve overall wellbeing, contributing to the transition to a low-emission transport sector ⁵¹.
4. **New Vehicle Efficiency Standard:** The implementation of a new vehicle efficiency standard is intended to increase the availability of cleaner and cheaper-to-run vehicles. This standard encourages the supply of hybrid vehicles and zero-emissions vehicles, such as electric vehicles, in the Australian market, contributing to a cleaner, greener, and more sustainable transport sector over time ⁵¹.
5. **Emissions Standards:** Mandating international emissions standards for newly approved heavy vehicle models is another mechanism to reduce vehicle emissions.

By enforcing emissions standards, the Australian government aims to contribute to the overall reduction of greenhouse gas emissions from the transport sector ⁵¹.

These specific mechanisms and initiatives outlined in the policy document demonstrate a multi-faceted approach to achieving zero emissions targets in urban areas, focusing on transportation, infrastructure, vehicle efficiency, and the promotion of low-emission technologies.

Are there any mechanisms in place to assess or review conformance and performance of cities?

The policy document includes mechanisms to assess and review the conformance and performance of cities in relation to sustainability, emissions reduction, and climate action. Here are some key mechanisms outlined in the document:

1. **Improving the Evidence Base:** The document emphasises the importance of monitoring the implementation of changes in cities to provide evidence for informing future decisions and driving improvement and innovation. Collaboration between governments to enhance the national urban evidence base, commitment to evidence-based policy interventions, and rigorous evaluation of outcomes are highlighted as essential for assessing city performance ⁴².
2. **Public Reporting of Data and Outcomes:** The document stresses the importance of ensuring that public investment delivers publicly reported data and outcomes. By transparently reporting data and outcomes, cities can track their progress, identify areas for improvement, and demonstrate accountability in meeting sustainability and emissions reduction targets ⁴².
3. **Frameworks for Measuring Progress:** Clear and consistent frameworks are mentioned as necessary for measuring progress and monitoring the implementation of plans, policies, and programs in cities. These frameworks provide a structured approach to evaluating city performance, tracking key indicators, and assessing the effectiveness of sustainability initiatives and climate action measures ⁴².
4. **Place-Based Approach to Collecting Evidence:** The document advocates for a place-based approach to collecting evidence, shared measurement evaluation, and learning involving communities and stakeholders. By engaging with local communities and stakeholders, cities can gather valuable insights, assess the impact of policies and programs, and tailor interventions to specific urban contexts for improved performance ⁴².

Overall, the document underscores the importance of robust mechanisms for assessing and reviewing the conformance and performance of cities in meeting sustainability, emissions reduction, and climate action goals. By implementing these mechanisms, cities can effectively track their progress, identify areas of success and improvement, and ensure accountability in working towards a more sustainable and resilient urban future.

Does the policy indicate the funding or the resources needed to achieve compliance to this policy?

The policy document provides insights into the funding and resources needed to achieve compliance with the outlined policy objectives related to sustainability, emissions reduction, and climate action in urban areas. Here are some key points regarding funding and resources mentioned in the document:

1. **Collaborative Funding Initiatives:** The document emphasises the importance of collaborative funding initiatives involving the Australian Government, states, territories, and other stakeholders to support the implementation of the policy objectives. This collaborative approach aims to leverage resources, expertise, and funding from various sources to address urban challenges effectively ⁹.
2. **Investment in Sustainability Initiatives:** The policy highlights the need to invest in sustainability initiatives to mitigate climate risks, promote sustainable transport, improve energy efficiency, and support circular economy initiatives. These investments are crucial for achieving emissions reduction targets, enhancing urban resilience, and fostering sustainable development in cities ³³.
3. **Support for Infrastructure Delivery:** The policy document mentions the support for infrastructure delivery in conjunction with the Infrastructure Policy Statement. This support includes funding and resources allocated to infrastructure projects that align with the policy objectives, such as promoting sustainable transport, enhancing disaster resilience, and addressing housing priorities ⁹.
4. **Incentives for Energy Efficiency:** The document suggests providing incentives for existing households and buildings to improve their energy efficiency and sustainability. These incentives can include financial support, grants, or rebates to encourage investments in energy-efficient technologies and practices, contributing to emissions reduction and sustainability goals ³³.
5. **Sustainable Procurement Practices:** The policy advocates for sustainable procurement practices, such as contracting locally first, diversifying the supplier base, and prioritising supplier sustainability credentials. By adopting sustainable procurement practices, governments can support small and medium enterprises, First Nations businesses, and minority businesses while promoting sustainability across supply chains ⁴².

Overall, the policy document acknowledges the importance of adequate funding, resources, and investments to achieve compliance with the policy objectives related to sustainability, emissions reduction, and climate action in urban areas. By leveraging collaborative funding initiatives, supporting sustainability initiatives, and implementing sustainable procurement practices, cities can access the necessary resources to drive positive environmental outcomes and create more resilient and sustainable urban environments.

Does the policy identify the need to enforce money laundering actions in regard to real estate, law and development sectors in Australian cities?

The policy document does not specifically mention the enforcement of money laundering actions in relation to the real estate, law, and development sectors in Australian cities. The focus of the document primarily revolves around urban policy objectives related to sustainability, productivity, health, and wellbeing in urban environments. While the document addresses various aspects of urban planning, infrastructure, and sustainability initiatives, it does not delve into the specific issue of money laundering in the real estate, law, and development sectors.

If you are looking for information on money laundering regulations and enforcement actions in Australia, it would be advisable to refer to relevant legislation, regulatory bodies, or official

reports that specifically address anti-money laundering measures in the real estate, legal, and development industries.

Does the policy deal with the dissemination of information to the community and the need for regional community centric data portals to enable communities to actively engage in 'smart cities' development?

The policy document emphasises the importance of improving information and data about Australian cities and engaging with communities in the development of smart cities. Here are some key points related to the dissemination of information to the community and the need for regional community-centric data portals to enable active engagement in smart cities development:

1. **State of the Cities Report:** The Australian Government is committed to improving information and data about Australian cities. One of the initiatives mentioned in the document is the regular publication of the State of the Cities report. This report aims to provide an accurate and up-to-date picture of life in Australian cities, enabling stakeholders to access relevant data and information for informed decision-making ¹⁴.
2. **Enhancing Community Engagement:** The policy underscores the importance of engaging with communities in urban development initiatives. By involving local residents, businesses, and stakeholders in the decision-making process, cities can ensure that development projects align with community needs and priorities. This community engagement approach fosters transparency, inclusivity, and collaboration in shaping the future of urban areas ¹¹.
3. **Regional Investment Framework:** The Regional Investment Framework, highlighted in the document, focuses on supporting strong, stable, and sustainable regions across Australia. This framework places regions and their people at the centre of decision-making, valuing local voices and priorities. By listening to and building on the latest evidence to inform investment decisions, the framework aims to engage communities in regional development efforts ¹¹.
4. **Smart Solutions and Data Portals:** The document mentions harnessing data and smart solutions to enhance efficiency, improve services, and empower residents in urban centres. Developing interconnected urban centres that leverage technology for the benefit of communities is highlighted as a key aspect of smart cities development. Additionally, supporting regional community-centric data portals can enable communities to actively engage in urban development processes by providing access to relevant data and information ⁴³.

Overall, while the policy document does not explicitly mention the establishment of regional community-centric data portals, it underscores the importance of community engagement, data transparency, and the use of smart solutions in urban development. By enhancing information dissemination, promoting community involvement, and leveraging data-driven approaches, cities can foster active participation and collaboration in the development of smart and sustainable urban environments.

Does the policy consider the need to develop creativity and innovation in cities and to build a circular economy that allows Australian cities to become centres for creative economies that are not dependent on other countries for their key intellectual infrastructure?

The policy document acknowledges the importance of fostering creativity, innovation, and building a circular economy in Australian cities to enhance economic diversity, sustainability, and self-reliance. Here are some key points related to the development of creativity and innovation, as well as the promotion of a circular economy within Australian cities:

1. **Support for Cultural and Creative Industries:** The policy emphasises the significance of supporting cultural and creative industries to contribute to the unique identity of each city and enhance social sustainability through shared participation in urban life. By fully integrating culture and creativity into local development strategies, cities can encourage economic diversity, investment, and innovation while fostering entrepreneurship and supporting research and development ⁴³.
2. **Embracing Digital City Technologies:** The document highlights the importance of embracing digital city technologies and innovation to improve urban efficiency, enhance services, and address contemporary challenges. This includes leveraging digital infrastructure, data-driven decision-making, and technology solutions to contribute to sustainable urban development. By adopting innovative technologies, cities can enhance their competitiveness, attract investment, and create new opportunities for growth ⁴³.
3. **Transitioning to Circular Economies:** The policy underscores the necessity of transitioning to circular economies for urban sustainability. By embracing principles of waste reduction, recycling, and material reuse, cities can minimise resource consumption, promote environmental conservation, and reduce emissions. Building a circular economy in Australian cities can contribute to resource efficiency, sustainability, and resilience in the face of global challenges ³².
4. **Reducing Dependency on External Intellectual Infrastructure:** While the document does not explicitly address reducing dependency on other countries for key intellectual infrastructure, the focus on fostering creativity, innovation, and sustainable practices within Australian cities aligns with the broader goal of enhancing self-reliance and building resilient urban economies. By nurturing local talent, promoting innovation hubs, and supporting creative industries, cities can strengthen their intellectual capital and reduce reliance on external sources for critical infrastructure and expertise.

In summary, the policy document recognizes the importance of developing creativity, innovation, and circular economies in Australian cities to drive economic growth, sustainability, and self-sufficiency. By promoting cultural and creative industries, embracing digital technologies, and transitioning to circular models of production and consumption, cities can position themselves as centres for creative economies that are resilient, innovative, and less dependent on external intellectual infrastructure.

To what extent does the policy seek to overcome the problem that it is the very nature of high density development in Australia that is a major contributor to housing affordability?

The policy document acknowledges the challenges associated with high-density development in Australia and its impact on housing affordability. Here are some key points that address this issue:

1. **Housing Affordability Concerns:** The document recognizes that housing affordability remains a major issue in urban areas, especially due to a shortfall in diverse,

well-located housing and demand outpacing supply. Limited access to social services and transport, particularly in outer urban areas, also contributes to inequity among communities. The policy highlights the need for initiatives to increase housing supply, improve access to affordable housing, and invest in transport and social infrastructure to address these challenges ²¹.

2. **Urban Development Patterns:** The policy acknowledges that continued outward growth, often associated with high-density development, can contribute to sustainability concerns, loss of agricultural land, increased greenhouse gas emissions, urban heat island effect, high material footprint, and greater infrastructure investment needs. By recognizing the implications of urban development patterns on housing affordability and sustainability, the policy aims to address these issues through strategic planning and reforms ²².
3. **National Housing Accord and Planning Reforms:** To tackle housing affordability challenges, the Australian Government has agreed to a National Housing Accord with states, territories, local government, institutional investors, and the construction sector. The Accord includes ambitious targets to build new well-located homes over a specified period. Additionally, the National Cabinet has endorsed a National Planning Reform Blueprint outlining measures to improve housing supply through planning, zoning, land release, and other initiatives. These reforms are crucial in addressing housing challenges and testing better ways of building houses that are resilient and suited to changing climate conditions ²².
4. **Community Engagement and Decision-Making:** The policy emphasises the importance of engaging with communities in urban development initiatives. By involving local residents, businesses, and stakeholders in decision-making processes related to housing development, cities can ensure that projects align with community needs and priorities. This community engagement approach fosters transparency, inclusivity, and collaboration in addressing housing affordability concerns ³².

In conclusion, while high-density development in Australia poses challenges to housing affordability, the policy document recognizes the need to address these issues through initiatives that increase housing supply, improve access to affordable housing, and engage with communities in decision-making processes. By implementing strategic planning reforms, fostering community involvement, and promoting sustainable urban development practices, the policy aims to overcome the housing affordability challenges associated with high-density development in Australian cities.

Does the policy know what the nature of the 'reforms' are that will solve the affordability problem?

The policy document outlines several key reforms and initiatives aimed at addressing housing affordability challenges in Australian cities. Here are some of the key reforms highlighted in the document:

1. **National Housing Accord:** The Australian Government, in collaboration with states, territories, local government, institutional investors, and the construction sector, has agreed to a National Housing Accord. This accord includes ambitious targets to build new well-located homes over a specified period. The accord aims to increase the

supply of housing in strategic locations to improve affordability and accessibility for residents ⁴⁹.

2. **National Planning Reform Blueprint:** National Cabinet has endorsed a National Planning Reform Blueprint that outlines measures to improve housing supply through planning, zoning, land release, and other initiatives. These reforms are essential in addressing housing challenges, testing better ways of building resilient homes suited to changing climate conditions, and promoting sustainable urban development practises ²².
3. **Housing Initiatives:** The Australian Government is implementing various housing initiatives to support states and territories in achieving their housing targets under the National Housing Accord. These initiatives include the Housing Support Program, New Homes Bonus, and the Social Housing Accelerator payment. These programs aim to increase the supply of well-located homes, particularly for those in need of social and affordable housing ²².
4. **Community-Centric Data Portals:** While not explicitly mentioned as a reform, the policy emphasises the importance of engaging with communities in urban development initiatives. By supporting regional community-centric data portals, communities can actively engage in urban development processes by accessing relevant data and information. This engagement can help inform decision-making and ensure that housing reforms align with community needs and priorities ²³.
5. **Innovative Housing Solutions:** The policy encourages testing innovative ways of building houses that are more resilient and suited to the changing climate. By promoting sustainable building practices and encouraging the transition to net-zero housing, the policy aims to address affordability challenges while advancing environmental sustainability goals ²².

Overall, the policy document outlines a comprehensive approach to addressing housing affordability issues through a combination of strategic reforms, housing initiatives, planning reforms, community engagement, and innovative housing solutions. By implementing these reforms and initiatives, the policy aims to improve housing affordability, increase supply, and promote sustainable urban development in Australian cities.

ATTACHMENT 2

Each of these papers address specific issues which have arisen in urban policy matters in Brisbane and SEQ over the last few years.

2024

[QUT's Data Care for Smart Cities Project](#)

THIS PROJECT OUTLINES A WAY OF ENGAGING COMMUNITY AND URBAN DATA

[BRU Submission on new EDQ \[Economic Development Qld\] Legislation](#)

THIS SUBMISSION INDICATES HOW STATE GOVERNMENTS ARE AVOIDING THEIR OWN POLICIES TO IMPLEMENT PROJECTS WITHOUT EFFECTIVE CHECKS AND BALANCES

[BRU Submission on NEL \[New Environmental Laws\]](#)

THIS SUBMISSION DETAILS SIGNIFICANT FLOW ON IMPACTS FOR THE ENVIRONMENT WHEN THE PLANNING SYSTEM IS SHOOTING ITSELF IN THE FOOT

[BRU Submission on Housing](#)

BCC IS THE LARGEST LGA IN AUSTRALIA AND THEY REFUSE TO CONSIDER ANY OTHER FORM OF HOUSING THAN HIGH DENSITY

2023

[A Resident's Perspective](#)

THIS ILLUSTRATES THE MECHANISMS THAT ARE OPERATING AT THE LOCAL LEVEL TO STYMY EFFECTIVE LOCAL DEVELOPMENT

[Local Issues](#)

THIS ILLUSTRATES THE MECHANISMS THAT ARE OPERATING AT THE LOCAL LEVEL TO STYMY EFFECTIVE LOCAL DEVELOPMENT

[Regional City Issues](#)

THIS HIGHLIGHTS THAT A LARGE LGA IS ABLE TO GAIN COMMONWEALTH FUNDING AT THE EXPENSE OF COMPLYING WITH REGIONAL PLANNING REQUIREMENTS

[Request for Evidence of Governance to Support SEQ Regional Plan](#)

REGIONAL PLANNING IS VAGUE AND FUZZY

[Brisbane's Future?](#)

A LACK OF INVESTMENT IN COMMUNITY UNDERSTANDING LEADS TO PERVERSE JUSTIFICATIONS FOR NOT PROCEEDING WITH GENTLE DENSITY

[Finding your way around the SEQ Regional Plan 2024](#)

SOME PLANNING INSTRUMENTS ARE DESIGNED TO OBFUSCATE WHAT'S HAPPENING

2022

SEQ

[SEQ Regional Plan Review](#)

[SEQ Protected Landscapes Report](#)

[How the Commonwealth Government facilitates urban intensification projects](#)

[SEQ City Deal Information and Action Request from SHCG](#)

[South East Queensland Report](#)

Brisbane

[Brisbane: Welcome to the 200km City?](#)

[Brisbane's Unsustainable Growth Strategy](#)

[A Brief Review of BCCs Housing Action Supply Plan - Its All Bad News Sorry](#)

[Request to BCC Lord Mayor for Explanation of Why Brisbane's Housing is at Odds with the SEQ Regional Plan](#)