

4 July 2024

**Department of Infrastructure, Transport,
Regional Development, Communication & the Arts**

Email: urbanpolicyinput@infrastructure.gov.au

Re: A National Urban Urban Policy for Australia

To Whom it May Concern,

Queensland Conservation Council (QCC) is the peak body for the conservation movement in Queensland and we welcome this opportunity to provide a submission to the *National Urban Policy consultation draft* (the draft Policy).

Queensland is experiencing significant growth. In particular our most urbanised region, South East Queensland (SEQ), a globally renowned biodiversity hotspot, is under housing and ecosystem pressures, whilst projections are that we will need to accommodate another 2.2 million people by 2046.

This ambitious pace of growth is against the challenging backdrop of cyclones, floods and bushfires, increasing climate risk and volatility, and serious questions related to water supply and security.

The manner in which SEQ is currently developing is degrading the sustainability and liveability of the region. We must get our urban development strategies and planning frameworks right, if we are to retain what we love about the region and ensure healthy and flourishing communities, ecosystems and economies into the future.

Over the last 8 months we have commissioned three independent expert reports looking at different aspects of best practice regional planning and urban design for SEQ.

Although focussed on SEQ, their findings, principles and recommendations could be widely applicable to other urban and growth areas across Australia, and could also help inform the ongoing urban policy work, and we commend them to you:

The Queensland Conservation Council acknowledges that we meet and work across the many lands of Queensland. We wish to pay respect to their Elders - past and present - and acknowledge the important role all Aboriginal and Torres Strait Islander people play in protecting, conserving and sustaining Queensland.

Best Practice Regional Planning for SEQ, SGS Economics and Planning, available at: https://www.queenslandconservation.org.au/seq_housing_crisis_can_be_solved_without_more_urban_sprawl

Holding the Line: Reversing Biodiversity Decline, Shannon Mooney & Associates, available at: https://www.queenslandconservation.org.au/dire_threat_koalas_seq_urban_sprawl

Principles and Rules for Implementing Spatial Zoning under the EPBC Act: A technical report produced to help guide Australia's terrestrial regional planning efforts, Griffith University, University of Queensland & Australian National University: https://www.queenslandconservation.org.au/new_report_bioregional_planning

These have also shaped our recommendations in response to the draft Policy, below.

No-one and no place left behind: stopping urban sprawl

We welcome many aspects of the draft Policy, in particular the increased emphasis to update land use planning systems. However it could better describe and prioritise the kind of development our land use and urban design systems need to be retooled to foster and produce.

Reflecting the last challenge noted on p.22 of the draft Policy, the *Best Practice Regional Planning for SEQ* report noted:

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

SGS Economics and Planning

Our cities are already sprawling. Development must go up, not out. We are supportive of increasing "gentle" densification, and better utilising our existing urban footprints where land has already been disturbed.

Recommendation:

- The strategy should explicitly set out the pattern of preferred urban development, and *prioritise* mixed densification and infill, over more sprawl and greenfields development.
- 'Investing in supporting infrastructure' should include reference to 'green infrastructure.'

Our urban areas promote productivity: regional planning

The evidence in SEQ is that we are steadily going backwards on environmental indicators. It is death by a thousand cuts with the cumulative impacts of development, and insufficient protections for tree coverage and critical habitat. This is contributing not just to the trend towards functional extinction for iconic wildlife, such as our Koalas, but also indicates a consistent fragmentation and fragilising of the ecosystems.

We have just 35% remnant bushland across the region, and the development mooted in the latest *Shaping SEQ Regional Plan* risks sending us below the 30% ecological minimum necessary to maintain ecosystem integrity.

In 2022 the Commonwealth and Queensland Governments committed to joint Regional Planning (called Bioregional Plans in Queensland).¹ Bioregional Planning if done well, as envisaged, with a solid scientific basis, could be a critical mechanism to deliver on both streamlined development and environmental protection and restoration.

Recommendation:

- Regional Planning (Bioregional Planning), should be recognised within the strategy as a collaborative action with the States.
- It should also be noted as an investment need, to speed up and ensure the integrity of the SEQ process, as the pilot urban planning region for Australia.

Our urban areas are sustainable: nature inclusive design

For “sustainable” urban areas, the focus on the circular economy, and net zero is urgent and welcomed. However we are in the midst of overlapping housing, climate, *and* biodiversity crises. We must go beyond “sustainable” and aim for urban areas that are *biodiversity positive or nature inclusive* in their conception and design.

As part of this, green infrastructure and nature based solutions should also be incorporated more explicitly within the strategy. Combined, they are critical to driving much more transformative change in urban areas, contributing not just to urban biodiversity, but health, wellbeing and resilience.

Moreover, for us in SEQ, it is also central to our economic prosperity. As the hosts of the 2032 Olympics it is widely acknowledged that our unique value proposition to the world is not our shops or buildings. It is the natural environment, and the opportunity for visitors to experience our globally unique biodiversity that grows and lives throughout and around our cities.

¹ See: <https://statements.qld.gov.au/statements/96756>

Recommendation:

- The objective our “our urban areas are sustainable” should be expanded to include “sustainable and nature positive” or “sustainable and biodiverse.”
- Subsequent references and intentions should reflect this. For instance: “improve climate mitigation, *nature positive outcomes*, and aid the transition to a circular economy.

Our urban areas are safe: resilience requires investment in people and nature

With major drought, fires, cyclones and floods in just the last few years alone, we have learnt a great deal about what makes our communities safe and resilient. Our own *Queensland Strategy for Disaster Resilience*, points to the ‘5 lines’ of ‘systems based resilience’ being: Built; Human and Social; Economy; Roads and Transport; Environment.²

Yet much Commonwealth and State investment is still directed towards recovery based spending on buildings, and traditional, built infrastructure.

For instance whilst QCoast100 was a positive initiative and many Local Governments took steps towards developing Coastal Hazard Adaptation Strategies (CHAS), many still lack significant capacity to implement these, let alone respond in a more comprehensive manner to climate change, commensurate with the massively increasing risks and hazards across their regions.

And while infrastructure rebuilds are important after major weather events, we are dramatically under-valuing and under-investing in the people and nature aspects that are the bedrock to healthy communities, flourishing economies, and which will provide deepened and adaptive resilience going forward.

Recommendations:

- The *Resilient* goal should include a factor acknowledging that resilience is also determined by the social cohesiveness of local communities (not just built environment).
- Both the *Resilient* goal and *Our Urban Areas are Safe* should include an explicit reference to green infrastructure and nature based solutions being one of the critical aspects of climate resilient infrastructure.
- Our *Urban Areas are Safe* should include investments into building the capacity and resources for Local Governments, and communities, to deal with and adapt to increasing climate risk and hazards in proactive ways.

² Available at: <https://www.qra.qld.gov.au/qsdr>

Urban water supply security

Australia is the world's driest inhabited continent, which is predicted to become increasingly drier due to the alteration of rainfall patterns and increased evaporation caused by the effects of climate change, which will potentially lead to a substantial reduction of water available in the future for consumptive and environmental purposes alike.

Given that it will significantly reduce the reliability of urban water supply sources across the nation, it is very concerning that the Draft Policy does not contain any specific actions or strategies to address the impacts of climate change on the security of urban water supply sources across the country.

As the future reliability of dams and other traditional urban water supply sources will be greatly reduced due to the effects of climate change, it is essential that alternative water management and supply options are developed to ensure that Australia's urban centres do not run out of potable water as what nearly occurred in South East Queensland during the Millennial Drought.

Alternative water management and supply options that must be developed to ensure Australia's urban centres do not run out of potable water includes, but is not limited to:

- Reducing water demand by requiring all water users to use available water as effectively and efficiently as possible and requiring all new and existing dwellings to install water efficient fixtures/appliances and rainwater tanks,
- Requiring all new urban development to be water self-reliant through the adoption of Water Sensitive Urban Design (WSUD), stormwater harvesting and waste water recycling and,
- Desalination as a last resort, subject to using renewable energy and the discharge of hypersaline wastewater does not cause adverse impacts to marine receiving environments.

Without implementing the above-mentioned and other feasible alternative water management and supply options, there is a significant risk that Australia's urban centres will run out of potable water at some point in the future.

Recommendation:

- Urban water supply security poses a significant risk to our urban regions and must be elevated and incorporated explicitly into the strategy, in line with the suggestions above.

Thank you for the opportunity to contribute, we look forward to taking part in further discussions regarding the development of this draft Policy and implementation.

Kind Regards

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