



2 March 2017

Mr Greg Vann  
Project Director, SEQ Regional Plan Review  
Draft South East Queensland Regional Plan Feedback  
Department of Infrastructure, Local Government and Planning  
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**Cc:** Malcolm Middleton, Queensland Government Architect: [Malcolm.Middleton@dilgp.qld.gov.au](mailto:Malcolm.Middleton@dilgp.qld.gov.au)

Dear Mr Vann,

**Draft South East Queensland Regional Plan (2009-2031): Response by AILA Queensland**

As its official response to the call for submissions as part of the public consultation process, the Australian Institute of Landscape Architects, Queensland (AILA) submits the following comments on the Draft South East Queensland Plan (Shaping SEQ) released in October 2016. The comments result from a detailed review of the document subsequent to our preliminary feedback as part of the Regional Plan Review (our correspondence of 9<sup>th</sup> June and 2nd August 2016 and meeting 20<sup>th</sup> June 2016).

AILA and its members have a longstanding interest in the development of the Regional Plan, including involvement in consultation on both the current SEQRP and ShapingSEQ. The AILA is committed to improving the health of our natural and built environments through their better planning, design and management. We promote decision-making strategies that increase the sustainability of these environments by acknowledging, protecting and enhancing existing environments and ecosystems as important resources for the health of all Australian cities. We advocate the use of innovative, responsive and adaptable processes, planning and designing landscapes that are resilient and can accommodate change, including where necessary, their regeneration and reconstruction. AILA champions the use of green infrastructure nationally (as ecosystem services) as a primary planning and design response to the contemporary challenges of sustainability and climate change in our urban environments (<http://www.aila.org.au>)

As specialists in environmental planning and design, members of the AILA engage in a wide range of activities and environments of direct relevance to the Plan and its goals, especially those relating to liveability and environmental quality. As professionals, they work in public and private practice for commercial interests, state and local government across the whole SEQ region and have as a result, wide experience of the challenges that face it, typically including:

- Developing strategies and policies to identify, protect and manage landscapes and environments of regional value;
- Planning and designing open space to foster vibrant and healthy communities;
- Designing and integrating new movement corridors into urban and rural landscapes;
- Master planning, designing and directing the construction of residential and urban precincts at all scales.



The AILA supports the government's intention to provide a clear and coordinated direction for the development of the SEQ region. To assist, we have structured our comments around the key Shaping SEQ themes of Grow, Live, Sustain, Prosper and Connect as well as the key issues we identified in our previous correspondence. Our submission has been prepared not only by our own members but for delivery (Chapter 4) with input from Dr Lyndal Plant, a colleague specialising in policy and strategy for the urban forest.

## KEY ISSUES FOR AILA

In responding to the draft regional plan, we are guided by the following 'overview' considerations which we have outlined in previous correspondence:

### **Key Issue: Urban Form (ShapingSEQ Goal 1 Grow)**

- The SEQ lifestyle is outdoors-oriented, and is part of distinguishing who we are, the 'liveability' of our communities and our sense of place. This observation underlies many of AILA's professional opinions and responses to the draft regional plan
- New higher density development, especially in established lower density areas, needs open space - there is a gap between high density and open space provision, which is not adequately addressed in the draft regional plan to date. For example, the current TOD focus on jobs and beds has lost sight of open space and outdoor recreation opportunities. This is currently evident in Brisbane's Fortitude Valley developments with high densities but no new open space. Open space should and can be a distinguishing feature of higher density in SEQ compared to all other capital city regions.
- This increased focus on open space should not be piecemeal, but needs regional coordination. ShapingSEQ should establish the framework for / encourage the identification in areas of significant urban growth of *regional urban open space opportunities* which have a broader social and amenity agenda including embracing arts and culture.

### **Key Issue: Accessible places (ShapingSEQ Goal 1 Grow)**

- Ensure essential open space needs of high density living are provided for within a *5-minute walking distance* or accessible by frequent public transport.
- Aim for a *universally accessible network* of regional open space from Noosa to the border and from Baton to Redlands. Require the larger master planned estates to take the lead.
- Ensure social housing enjoys equitable open space access as high priced housing.

### **Key Issue: The Role of the Design Professions (ShapingSEQ Goal 2 Prosper)**

- Work with AILA and others to establish agreed *key metrics for measuring success* of open space provision, use and quality
- Review and consolidate the policies on *% for art* programme for all public works: (for instance this should apply to private developments over a certain size. It works in the Brisbane CBD. Each council should run a programme of supporting locals, and tap into school programmes).



- Encourage all local authorities to employ *registered landscape architects (RLA)* on staff when undertaking community planning activities

***Key Issue: A prosperous State (ShapingSEQ Goal 2 Prosper)***

- Undertake a *comprehensive audit* of places and spaces supported by visitor surveys which underpin the State's attractiveness to tourists
- The SEQRP should acknowledge the *economic value of open space* for tourism, sustaining land values of well-designed communities, and promoting health.

***Key Issue: Public and Active Transport (ShapingSEQ Goal 3 Connect)***

- Ensure all new road corridor design allows sufficient corridor width and space for long term landscape and public realm interfaces with other community uses. Acknowledge that roads are public space and take up about 10 % of all land use.
- Encourage the upgrading / re-purposing of road reserves to shared streets, parkways and boulevards wherever possible, at all scales, especially where public open space cannot provide for the needs of an expanding and denser population.
- Establish a collaborative framework, and annual targets, for funding and management of regional trails and rail trails.
- Champion planning and design responses to the challenges of urban sustainability and climate change adaptation including through the delivery of active transport and green infrastructure.

***Key Issue: Landscape Management (ShapingSEQ Goal 4 Sustain)***

- Require that agencies undertake open space management plans for all public open space systems

***Key Issue: Scenic Amenity (ShapingSEQ Goal 4 Sustain)***

- Establish a programme of scenic amenity management guidelines and possible financial support to landowners in key tourism locations and significant landscapes
- Support the development of strategies and measures that pro-actively target landscape and scenic amenity enhancements.
- Understand local character and the values that communities place on their local environment as a basis for creating a diverse and attractive region with a strong sense of identity.

***Key Issue: Connect with the past (Goal 4 Sustain)***

- Undertake a register of Heritage trees and landscapes through a community led process and ensure the protection and enhancement of such features in any future planning schemes
- Fund a regional study of the cultural history of landscape and flora in SEQ with a view to listing and protecting and managing features significant to our community
- Acknowledge the role of landscapes and individual landscape elements in the State's heritage values and establish a suitable management regime to protect these qualities



**Key Issue: Green Infrastructure and Open Space (ShapingSEQ Goal 5 Live)**

- Review *street design standards* to rebalance vehicular priorities and ensure provision of street trees and other landscape appropriate to the subtropical location.
- Review the funding of urban parkland management and maintenance to incorporate more innovative approaches and support higher design outcomes. This would be achieved for example by requiring each new planning scheme to undertake a landscape analysis of urban structure options at both a whole of shire level and then at key urban fronts. Good green spaces support diversity, high quality liveability and good environmental outcomes: it is more than protecting interurban breaks.
- Require all public open space and public realm development feasibility to be assessed based on *whole of life cost*.

**Key Issue: A healthy State (ShapingSEQ Goal 5 Live)**

- Acknowledge the role of landscape and open space in mitigating the effects of *Climate change* and long term development risks and enable this service to be valued accordingly.
- Require the measurement of *urban solar absorption* and monitor the provision of vegetation and open space to ensure a healthy urban living environment
- Promote the provision of areas for *Community gardens* and local food production and distribution

**AILA OVERVIEW OF SHAPING SEQ**

AILA supports key aspects of the proposed plan including:

- Emphasis on infill development and consequent minimisation of the expansion of the urban area into the surrounding rural and natural landscapes of SEQ
- The high value placed on supporting high quality design outcomes to deliver positive new development that is distinctive and unique to SEQ
- Acknowledgement and support of green infrastructure and their importance in achieving integrated outcomes for the region. Recognition of the opportunity for bigger connections for multi-layered outcomes
- Support for the identification and protection of scenic amenity values including through the retention of scenic amenity mapping and values within the Plan.

However, we are concerned about a range of key issues, particularly:

- Lack of a process or framework to indicate how competing values will be resolved e.g. where the need for transport connectivity conflicts with natural environmental values.
- Unclear mechanisms for ensuring compliance with the plan.
- Lack of published and measurable targets and metrics for key performance parameters such as carbon reduction, total 'Greenspace' area and new regional open space areas.
- Absence of a Regional Recreation Strategy or a mechanism for this to be developed in the future.
- Absence of aspiration and policy for improving the quality of all landscape including degraded landscapes.



- Reliance upon scenic amenity mapping which has methodological flaws as advised by AILA previously to the Department in relation to this Draft and the Current South East Queensland Regional Plan\*
- Lack of direction on minimising the impact of infrastructure and working with our ecological systems, recognising that all infrastructure including transport infrastructure should be envisaged and planned to deliver the full potential of economic, environmental and social outcomes.
- Lack of clear reference to the Ecosystem Services Framework concept.
- Concern regarding precedent regarding future encroachment into Regional Landscape and Rural Production Area established in ShapingSEQ.

\*AILA Queensland provided a detailed analysis of Implementation Guideline Number 8 at the consultation phase of the current SEQRP, outlining our concerns with the methodology and – particularly – the tools for assessing the impacts of development on scenic amenity values. We have provided this information to you previously.

In relation to the current ShapingSEQ themes and consistent with our prior advice and, we advise as follows:

**GOAL 1: GROW**

*“SEQ has a consolidated urban structure of well-planned and more complete communities. There is sufficient land to accommodate the projected population and employment growth in an affordable and sustainable way to meet the community’s changing lifestyle needs.”*

**AILA Response:** The SEQ lifestyle is outdoors-oriented, and is part of distinguishing who we are, the ‘liveability’ of our communities and our sense of place. We need to grow in a manner that respects and reinforces local identity and sense of place. This observation underlies many of AILA’s opinions and responses to the draft regional plan. For the ‘Grow’ theme we are concerned that there is a disconnect between the vision and the themes, many elements are not pulled through into the strategy.

Cross-reference to ShapingSEQ	AILA Response	AILA Queensland Position
	<b>KEY ISSUE: URBAN FORM</b>	
<b>Grow, Element 1: Efficient land use and Grow, Element 2: Focussing density</b>	<ul style="list-style-type: none"> <li>• Additional urban breaks and/or inter-urban breaks should be identified and protected at the regional level, including breaks that are already recognised locally to retain sense of place and focus density. For example, the Bald Hill Flats between Moreton Bay and Brisbane.</li> <li>• The Plan focusses heavily on infill housing to reduce urban sprawl, however does not provide a clear policy direction to address the instances where urban sprawl already exists.</li> </ul>	<ul style="list-style-type: none"> <li>• Protect and reinforce <i>inter-urban breaks</i> and green wedges to encourage compact urban form and a high quality setting for our urban areas.</li> </ul>
<b>Grow, Element 2 – Focussing density</b>	<ul style="list-style-type: none"> <li>• Strategy 2 should be expanded to say “good access to high frequency public transport, employment <u>and open space for all</u>”</li> </ul>	<ul style="list-style-type: none"> <li>• Creatively address the challenge of providing adequate quality and variety of publicly</li> </ul>



		<p>accessible open space, including both public open space and other urban places which effectively contribute to function and enjoyment of the public realm.</p>
<p><b>Grow, Element 3 – New Communities</b></p>	<ul style="list-style-type: none"> <li>• Strong focus on jobs and dwellings without addressing follow-on impacts of population increase and landscape needs.</li> <li>• Concern that the protection of areas considered suitable for urban growth within the Regional Landscape and Rural Production Area devalues its sense of permanence in relation to the urban footprint. These areas should be identified in a separate category that protects them from development that would prejudice their long-term urban use but without the potential inference that the erosion of the RLRPA is acceptable.</li> </ul>	<ul style="list-style-type: none"> <li>• Protect and reinforce <i>inter-urban breaks</i>, green <i>wedges</i> and the management of Regional Landscape and Rural Production Area to encourage compact urban form and a high quality setting for our urban areas.</li> </ul>
<p><b>Grow, Element 4: Housing diversity</b></p>	<ul style="list-style-type: none"> <li>• Focusses on providing housing choices/diversity, but does not offer consideration for diversity in open space typologies and how these change in specific urban and rural environments</li> </ul>	<ul style="list-style-type: none"> <li>• Support the provision of <i>publicly owned and managed</i> open space within rapidly developing urban areas and in areas transforming to higher density.</li> </ul>
<p><b>Grow, Element 5: Growing rural towns and villages</b></p>	<ul style="list-style-type: none"> <li>• Support policy position that seeks to avoid fragmentation of productive rural land, although consider the mapping associated with this is vague and should be strengthened.</li> <li>• ‘Grow’ only briefly mentions the protection of character and identity, however, this is not explored further nor are critical actions recommended. While some elements are addressed in ‘Live’ these cross references should be included in this theme.</li> </ul>	<ul style="list-style-type: none"> <li>• Protect quality of life by maintaining sense of place and ensuring all residents have ready access to open space.</li> </ul>



## GOAL 2: PROSPER

*“SEQ has a globally competitive economy focused on high-value economic activities supported by population-serving jobs. Leveraging traditional strengths and competitive advantages, areas of regional economic significance advance the economy and strengthen our global and national relationships, enabling economic growth and transition in response to emerging technology and new opportunities.”*

**AILA Response:** The long-term prosperity of South East Queensland and attraction to investors and workers is considered by AILA to be reliant on the lifestyle and liveability of the region. This is the region’s competitive advantage and this needs to be acknowledged and highlighted within this goal.

Cross-reference to ShapingSEQ	AILA Response	AILA Queensland Position
	<b>KEY ISSUE: THE ROLE OF THE DESIGN PROFESSIONS</b>	
<b>Prosper, Element 1: High-performing outward focused economy</b>	<ul style="list-style-type: none"> <li>AILA supports the strategy to support the growth of traditional economic industries including the creative industries. We consider the role of the arts and design community including the built environment professions should be recognised as a key element in enhancing the quality new development across our region.</li> </ul>	<ul style="list-style-type: none"> <li>Foster the continued growth of Queensland’s <i>vibrant design and arts community</i> including requiring public art to be part of all projects</li> <li>Ensure <i>professional landscape architects</i> are included in public projects requiring multi-disciplinary approaches</li> </ul>
	<b>KEY ISSUE: A PROSPEROUS STATE</b>	
<b>Prosper (general)</b>	<ul style="list-style-type: none"> <li>Tourism and Leisure does not currently feature prominently in the grow theme. The Elements should be expanded to support the tourism industry, particularly in relation to activities that are reliant upon our unique cultural and natural landscapes.</li> </ul>	<ul style="list-style-type: none"> <li>Recognise the role of regional landscape and the public domain of urban areas in underpinning the State’s attractiveness to international and national tourists</li> </ul>
<b>Prosper, Element 6: Special uses</b>	<ul style="list-style-type: none"> <li>Element 6 – special uses (e.g. quarries). The Plan should support the need to plan for positive use and multi-purpose use of buffers associated with special use areas e.g. for recreation, wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>Support multi-functional open space</li> </ul>

## GOAL 3: CONNECT



*“SEQ is a region of more complete and interconnected communities supported by a multimodal and integrated regional transport system that prioritises public and active transport for commuter trips. Infrastructure networks and services enable efficient and sustainable development, economic growth and social benefits throughout the region.”*

**AILA Response:** AILA supports *ShapingSEQ*’s position that we need to change our transport priorities to achieve a more sustainable, healthier and fairer transport system and the emphasis that this places on active and public transport. Active trails and access to greenspace need to be emphasized more in the Plan and we consider that more transparent prioritisation of the strategies and projects on a regional level is required.

Cross-reference to <i>ShapingSEQ</i>	AILA Response	AILA Queensland Position
	<b>KEY ISSUE: <i>PUBLIC AND ACTIVE TRANSPORT</i></b>	
<b>Connect, Element 1: An efficient movement system and Element 2, Integrated Planning</b>	<ul style="list-style-type: none"> <li>There is no specific mention of minimising the impact of infrastructure and working with our ecological systems only vague references to “conflicts with other transport and land uses”. Transport infrastructure should be envisaged and planned to deliver the full potential of economic, environmental and social outcomes including scenic amenity, urban amenity, reducing carbon emissions, environmental sustainability, WSUD, wildlife or biodiversity. Transport infrastructure in <i>ShapingSEQ</i> appears to be treated solely as the provision of corridors for movement of people without recognition that they create major impacts on the quality of life of adjoining urban areas and the sustainability of ecosystems which needs to be planned, mitigated and managed as a part of any expansion or upgrade of the transport network.</li> </ul>	<ul style="list-style-type: none"> <li>Redefine the <i>role and design of road corridors</i> that express the full potential of environmental, social and economic benefits from green infrastructure strategies, as well as the active retrofit of grey infrastructure to green infrastructure.</li> </ul>





<p><b>Connect, Element 2, Integrated Planning and Table 23 Measures that matter</b></p>	<ul style="list-style-type: none"> <li>• Within the 2041 planning horizon (the next 25 years), there are no timeframes given for delivery of any transport infrastructure. Reference is made to advancing prioritisation through the Queensland State Infrastructure Plan (2016). Transport infrastructure priorities should be resolved and included in ShapingSEQ. It is also noted that the State Infrastructure Plan appears to place higher values on green infrastructure with ecological systems than ShapingSEQ and these values should be translated and included in the final Plan.</li> <li>• There are no clear targets for future mode share for the region, only a vague indication of a preferred future of declining car share usage. This will only be achieved through numeric targets backed by a plan to achieve them within ShapingSEQ. Without this, there is little chance of significant improvement from the current situation which shows car usage increasing and active transport declining.</li> </ul>	<ul style="list-style-type: none"> <li>• Champion planning and design responses to the challenges of urban sustainability and climate change adaptation including through the delivery of active transport and green infrastructure.</li> </ul>
<p><b>Connect, Element 3: Active transport</b></p>	<ul style="list-style-type: none"> <li>• There is no mention of public and active transport links to provide residents with access to a range of <i>open space and recreational experiences</i>. Residents need to be able to use public transport to access and enjoy greenspace including local areas and large natural landscapes such as the D’Aguilar Range. This is considered essential for community health and wellbeing, particularly in the face of increasing density within the urban areas.</li> <li>• Access to and within these areas need to be supported through the establishment of regional trails for cycling, walking and/or riding. This is referenced in the text but not shown on the accompanying mapping. This needs to be addressed. See more in Measures that Matter below.</li> </ul>	<ul style="list-style-type: none"> <li>• Support strong public and <i>active transport links</i> to provide residents with access to a range of open space and recreational experiences.</li> </ul>



<p><b>Connect, Element 3: Active transport</b></p>	<ul style="list-style-type: none"> <li>• We support the reference to safety in this element, including through the design of new urban communities. We encourage this to be expanded to encourage and facilitate enhanced safety through the design and retrofitting of existing outdated infrastructure.</li> <li>• We recommend that ShapingSEQ champions the Living Streets concept and establishes and enforces standards for the design of all streetscapes that encourage active transport uses.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure Safety and amenity in public transport through an <i>integrated design approach</i> to transport hubs and connections</li> </ul>
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**GOAL 4: SUSTAIN**

*“SEQ’s natural assets and regional landscapes are protected and nurtured to sustain our regional population, comprising strong and diverse communities that are safe, fair, sustainable, resilient and prepared for climate change. Together, our environment and communities will ensure future generations enjoy a good quality of life and affordable living options.”*

**AILA Response:** The ‘Sustain’ theme is a key element in relation to the work of landscape architects. ShapingSEQ establishes the values placed upon natural and cultural landscapes across the region that will filter down into all aspects of planning the region. We support the ideology of ShapingSEQ in respect to the sustain theme. However, we are concerned that a lack of clear aspirational policy and omission of key aspects will hamper the continued protection and enhancement of our unique environments. Some key issues include:

Cross-reference to ShapingSEQ	AILA Response	AILA Queensland Position on the SEQR
	<b>KEY ISSUE: LANDSCAPE MANAGEMENT</b>	
<p><b>Sustain, Element 3: Regional Landscapes and Element 4: Natural Resources</b></p>	<ul style="list-style-type: none"> <li>• We are concerned that sustainable land management is not referenced specifically under any of the elements, themes and strategies that will drive the delivery of the plan - only referenced in general terms in the more descriptive parts of the document. Specifically, we are concerned there no reference to WSUD/water sensitive urban design in the regional plan goals or elements - only passing references to urban greening and stormwater harvesting. The final plan should address these issues.</li> <li>• We consider the State Planning Policy should be reviewed in terms of quality and quantity of Healthy Waterways. The</li> </ul>	<ul style="list-style-type: none"> <li>• Support best practice sustainable landscape management and water sensitive urban design to promote healthy functioning of landscapes including natural values and to deliver maximum public benefit.</li> </ul>



	<p>Regional Plan needs to raise the bar for performance, which will be achieved for example by promoting Integrated Catchment Management and Total Water Management; recognising the particular importance of land management to our sensitive bayside environments.</p> <ul style="list-style-type: none"> <li>• We are highly concerned that valued areas already are mostly already protected as part of National Parks etc. and/or are not suitable to development and the plan does little to expand landscape management beyond these areas. We are particularly concerned that the RLRPA and other land lying close to urban areas (which is most easily accessible to the population) is least protected and most at threat. The plan does nothing to address this – a strategy for protection and enhancement of such land should be promoted through the plan.</li> <li>• We recommend that Element 3 – regional landscapes and Element 4: Natural Resources needs to have a strategy that addresses sustainable land management of landscapes and water across the whole region (including the seascape landscapes of Moreton Bay).</li> </ul>	
<p><b>Sustain, Element 2 – biodiversity, Element 4: Natural Resources and Element 7: Climate Change</b></p>	<ul style="list-style-type: none"> <li>• We consider the plan provides insufficient protection for valued vegetation communities – In particular it does not provide adequate protection for areas that are classified as MLES (Matters of Local Environmental Significance). It does not adequately protect areas from tree clearing including on private land/development applications. It does not sufficiently actively promote further habitat connectivity to encourage robustness and resilience in natural systems and corridors. We recommend that the final plan reconsiders these aspects and seeks to achieve these goals, through (for example) including published aspirational targets to minimise impacts on existing vegetation and actively</li> </ul>	<ul style="list-style-type: none"> <li>• Support best practice in the management of rural areas including restriction on widespread tree clearing and promotion of natural sequence farming.</li> </ul>



	enhance habitat values and connectivity.	
<b>Sus: LIVE Element 4 – Working with Natural Systems</b>	<ul style="list-style-type: none"> <li>• AILA considers that Strategy 4 should be expanded to incorporate the use and role of open space in addressing extreme weather events (including flooding). This should include active planning for flood mitigation through open space networks. In particular, the plan should necessitate careful planning of high density areas and promote (with incentives if necessary) development forms and types that can work with flooding.</li> </ul>	<ul style="list-style-type: none"> <li>• Acknowledge the role of open space systems in mitigating storm surge and other extreme weather events and incorporate integrated water management planning into urban open space systems.</li> </ul>
	<b>KEY ISSUE: SCENIC AMENITY</b>	
<b>SUSTAIN: Element 3 – Regional Landscapes</b>	<ul style="list-style-type: none"> <li>• AILA applauds the continued inclusion of scenic amenity values and concepts as a driver for the protection of landscape values at a regional scale. This includes the inclusion of areas of seascape within the regionally significant areas.</li> <li>• However, we consider the concept needs to be expanded and a more holistic and pro-active approach taken to identifying, protecting, managing and enhancing landscape values - including character, identity and heritage.</li> <li>• We also consider that greater emphasis should be made on requiring the identification of scenic amenity values of local communities across the region which would recognise those areas valued in the context of the everyday lives of communities across the region.</li> <li>• We would like ShapingSEQ to fund a further assessment of scenic amenity and character values (including as indicated in Live Element 3 Strategy 1) as the basis for the inclusion of additional areas which can logically be considered as being a regionally significant landscape resource for the region including, but not limited to: <ul style="list-style-type: none"> <li>○ the southern Moreton bay areas, Pumicestone Passage, and wider area around all the bay islands</li> <li>○ Inland water bodies such as Lake Somerset</li> </ul> </li> <li>• We encourage support of further</li> </ul>	<ul style="list-style-type: none"> <li>• Develop further the concept and methodology for Scenic Amenity management within SEQ – including a review and update of Implementation Guideline Number 8<sup>#</sup></li> <li>• Protect the scenic amenity, character and sense of place of our valued coastlines and hinterland landscapes and promote scenic enhancement across the region.</li> </ul>



	<p>assessment of scenic amenity values, including those valued by the community using processes such as the regional and local character assessments undertaken/ currently being undertaken by City of Gold Coast within that part of the region across a range of scales – for example the Gold Coast Landscape Character Study or Burleigh Heads Village Character Study.</p> <ul style="list-style-type: none"> <li>We consider sequential experiences of the region are also important and recommend expanding the mapping (Map 4B) to include regionally significant routes.</li> </ul>	
	<b>KEY ISSUE: REGIONAL HERITAGE VALUES</b>	
<b>Sustain (Generally)</b>	<ul style="list-style-type: none"> <li>We are concerned that there is insufficient value placed on heritage values including pre and post European landscapes. We request that heritage landscapes and routes be identified and mapped (where culturally appropriate) and guidance given on their future management.</li> <li>We recommend the preparation of a register of heritage trees and landscapes through a community led process and ensure the protection and enhancement of such features in any future planning schemes</li> <li>We encourage funding of a regional study of the cultural history of landscape and flora in SEQ with a view to listing and protecting and managing features significant to our community.</li> </ul>	<ul style="list-style-type: none"> <li>Acknowledge the role of landscapes and individual landscape elements in the State’s heritage values and establish a suitable management regime to protect these qualities</li> </ul>

**GOAL 5: LIVE**

*“SEQ is a region of great places that respond to our subtropical climate based on good design that creates an urban form delivering year-round outdoor and energy-efficient living in a leafy, subtropical landscape”*

**AILA Response:** The ‘Live’ theme is of particular interest to the landscape architectural profession. ShapingSEQ will have a profound influence on how our communities grow and the quality of the environment in which we live. Landscape Architects play an important role in facilitating development that protects and enhances the quality of life of those living in SEQ. We support the emphasis in ShapingSEQ on



design quality aspirations. The direction set in ShapingSEQ will be pivotal in ensuring that the various SEQ Councils value and plan for high quality design. We also support the acknowledgment in ShapingSEQ plan of the need to integrate a network of green infrastructure amongst our densifying future urban forms and the recognition of opportunities that existing and enhanced urban tree cover offer to supporting the community’s desire for access to a diversity of green space experiences, walkable neighbourhoods, local identity and well-designed urban development.

Recent home-grown research suggests that a significant shift in government policy at all levels is required to reverse trends towards least tree cover in areas of highest dwelling density and heat wave vulnerability, socio-economic inequities in tree cover distribution and downsizing of street trees (Daniel et al 2016; Plant and Snipe 2016; Shanahan et al 2014; Wang et al 2015). AILA Qld and allied professions, including urban forest specialists, support the Queensland Urban Design and Places Panel recommendations (page 35-36 Background Paper 5) to “*utilise our green assets better*” and “*define policy around green infrastructure in the same way that we do transport infrastructure.*” We offer the following specific responses to the elements and strategies of the LIVE goal to help shift policy and practice towards integration of GI into subtropical “density done well” and provide suggestions for strategic urban greening initiatives that deliver shaded pathways for walking and cycling, place making and urban vitality.

Cross-reference to ShapingSEQ	AILA Response	AILA Queensland Position
	<b>KEY ISSUE: GREEN INFRASTRUCTURE AND OPEN SPACE</b>	
<b>Live, Element 1: Valuing good design and Table 23 Measures that Matter.</b>	<ul style="list-style-type: none"> <li>• AILA agrees with the quantity/quality balance. However, discussion should focus on the relation to other major Australia Cities – noting and seeking to address the open space deficiency in the Brisbane context, in comparison with these areas.</li> <li>• ‘Measures that matter’ should identify, provide and provide timescale for the delivery of SEQ City targets, similar to NSW/Urban Growth – e.g. 8m<sup>2</sup>/person</li> <li>• We agree with the suggestion of Green Infrastructure analysis/planning within Planning Scheme/Policies (regulatory process) – this would assist with guiding the above point on defining targets.</li> </ul>	<ul style="list-style-type: none"> <li>• Foster <i>innovative and high quality landscape</i> and urban design at all scales; acknowledge that quality of space is as important as quantity.</li> </ul>
<b>Live, Element 1, Strategy 1: Ensure high-quality design for all development, particularly higher densities.</b>	We consider the definition of good design to be agile and able to respond to changing technology, trends, community values and aspirations. The increasing intensification of our cities and pressure on public realm and open space stresses the ongoing importance of valuing good design that continues to push the boundaries of innovation and creativity.	



	<p>AILA considers that ShapingSEQ should establish the requirement for high quality design to be regulated and enforced as part of development approval process. Some suggestions as to how this will be achieved include the following</p> <ul style="list-style-type: none"> <li>• Standardise requirements for minimum 10% site area dedication to “deep planting” spaces within all medium and high density common areas to support existing significant tree protection and large tree planting/growth that complements the scale of buildings, local subtropical identity and outdoor living.</li> <li>• Require local governments to develop local traffic management and streetscape renewal plans in areas targeted for higher density to optimise tree canopy cover.</li> <li>• Avoid trade-offs in green walls, roofs and green painted facades to primary requirements for trees in ground.</li> </ul>	
<p><b>Live, Element 1,</b> Strategy 2: Deliver well-designed development in accordance with the SEQ design manual.</p>	<p>AILA supports the Subtropical SEQ Design manual proposed: we consider this requires prioritisation and allocation of resources – see Measures that Matter below.</p>	
<p><b>Live: Element 3</b> <b>Inspiration from local character</b> - Strategies 1, 2, 3 and 4</p>	<p>AILA strongly supports these strategies. We consider understanding and promotion of local character is essential to strengthen and enhance South East Queensland’s subtropical identity and tourism value. In particular, we believe that ShapingSEQ should necessitate that Local Authorities prepare a range of strategies to support this, for example:</p> <ul style="list-style-type: none"> <li>• document existing trees including a health and management strategy and establish an augmentation and replacement strategy to achieve targets for the long term increase in canopy cover and to regulate preservation of existing trees.</li> <li>• Prepare Local Character Studies across the region – engaging with local communities (participatory planning) to define targets and aspirations to preserve/enhance local identity, acknowledging growth requirements (documenting existing trees,</li> </ul>	<ul style="list-style-type: none"> <li>• Understand local character and the values that communities place on their local environment as a basis for creating a diverse and attractive region with a strong sense of identity.</li> <li>• Recognise the <i>wider role of water bodies and the water / land interface</i> in providing social and environmental value to regional open space systems.</li> </ul>



	<p>heritage buildings, architectural style, materials, streetscapes, facilities and land-use)</p> <ul style="list-style-type: none"> <li>• Evaluate the role of water bodies including Moreton Bay, various rivers across the region including the Brisbane River, Lake Somerset and other reservoirs in the identity and recreation value for the region. The Regional Plan should promote the development of strategies to maximise the multiple use of these bodies and the identification and development of these undervalued assets that are vital to the health and vitality of our region (for example as per Brisbane City Council’s River Edge Strategy).</li> </ul>	
<p><b>Live, Element 5: Great places</b></p>	<ul style="list-style-type: none"> <li>• We support the emphasis on the importance of context, authenticity and good design in place making for specific localities.</li> <li>• Shaping SEQ should facilitate the establishment of a group of design/planning professions, development and business associations and educational institutions to utilise places identified in Map 5 as case studies/research/scenarios, including cost/benefit analyses. Possibly co-ordinated and shared outcomes through Qld Urban Design and Places Panel.</li> </ul>	
<p><b>Live, Element 2: Working with the weather</b> Strategy 3 Create urban places that contribute to activity and life on the street.</p>	<ul style="list-style-type: none"> <li>• AILA supports the objective to increase access to high quality public open space enhancing all aspects of outdoor living. However, we consider there is a need for targets to enshrine this in practice, for example functional tree canopy targets such as to “Provide 60% canopy cover for priority pedestrian and cycle routes” or agreed alternative.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage <i>green infrastructure</i> strategies and projects that enhance liveability, such as green roofs, green streets, public open space networks and improving urban tree canopy coverage.</li> </ul>
	<p><b>KEY ISSUE: A HEALTHY STATE</b></p>	
<p><b>Live, Element 4 Working with natural systems</b> Strategy 1 Respect and add to local landscape</p>	<ul style="list-style-type: none"> <li>• The AILA supports the policy to enable living without the aid of mechanical heating and cooling through good design.</li> <li>• We consider sustainable design requirements should be regulated to</li> </ul>	<ul style="list-style-type: none"> <li>• Acknowledge the role of well-designed public open space in <i>promoting healthy choices</i> in the community</li> </ul>





<p>character and ecological diversity to create places that demonstrate a strong respect for nature</p> <p>Strategy 4 Work with the region’s landscapes and waterways to deal with water management and urban heat island effects sustainably, provide urban-scale recreational resources and support small-scale urban food production by residents</p>	<p>optimise user comfort, promote indoor outdoor living, address solar shading and provide low-energy living. This should include consideration of whole of life costs to the end user.</p> <ul style="list-style-type: none"> <li>• The plan should strategically plan for the urban places of the future including land banking and conversion of sites already in Government ownership.</li> <li>• The AILA strongly supports the inclusion of green infrastructure solutions as components of all long term infrastructure and climate responsive planning to support transport, health, stormwater management, outdoor recreation, air quality and social equity outcomes.</li> <li>• We support and require the mapping, monitoring/performance in ShapingSEQ of urban greenspace networks, impervious cover, urban heat island effects and especially urban tree cover - <i>going beyond the current focus on areas of biodiversity value.</i></li> <li>• We encourage the SEQRP mandates that local governments set “functional tree canopy targets” based on existing tree cover mapping/measures and local priorities. e.g. BCC set a 50% tree shade cover target by 2031, for residential footpaths and park pathways in 2010 after measuring average tree canopy cover at 35% for footpaths and 39% for park pathways (including off road bikeways).</li> </ul> <p>Specifically, we request transparent aspirational targets and policies including, to:</p> <ul style="list-style-type: none"> <li>• Establish an open space network including interconnected pedestrian and cycle routes.</li> <li>• Establish a regional Urban Forest strategy/tree planting strategy.</li> <li>• Retrofit highly engineered drains and waterways using green engineering and WSUD treatments to enhance natural systems and bio diversity.</li> <li>• Enable all natural systems to become community assets – improve public access, increase recreational use, enhance</li> </ul>	
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	<p>ecological value.</p> <ul style="list-style-type: none"> <li>• Promote a common language and clarity of definition across “greenspace”, “open space”, “green infrastructure”, etc. that encourages a shift to <i>human</i> habitat values of local vegetation from existing focus on just biodiversity and recreation outcomes.</li> </ul>	
<p><b>Key Issue: Element 4 Working with natural systems</b> Strategy 2 Conserve and protect significant trees as valuable community assets and use these features to enhance local character.</p>	<ul style="list-style-type: none"> <li>• We request that Shaping SEQ requires that local planning schemes develop Significant Landscape Tree Overlays (to complement Biodiversity Overlays) and complementary Significant Landscape Tree Offset requirements to regulate "no net canopy area loss" to support adequate replacement/compensation where design alternatives to tree retention have been exhausted, including supplementing significant/SEQ/local subtropical iconic tree planting in the public realm.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage <i>green infrastructure</i> strategies and projects that enhance liveability, such as green roofs, green streets, public open space networks and improving urban tree canopy coverage.</li> </ul>
<p>Strategy 3 Utilise extensive native vegetation and large shade trees in public spaces and along streets to encourage walking and cycling, and comfortable use of the outdoors.</p>	<p>The AILA recommends that ShapingSEQ:</p> <ul style="list-style-type: none"> <li>• Requires local authorities and transport infrastructure to integrate existing significant and large growing shade tree plantings as part of all train station, bus station, bikeway, outdoor carpark and road upgrade projects to provide attractive and comfortable walking and cycling.</li> <li>• Encourages state and local government in participatory planning and implementation of shade tree planting along walk to school routes as part of “Active School Travel” projects.</li> <li>• Recognises the importance of iconic non-invasive exotic shade trees such as Poinciana, Weeping and Banyan figs as just as important to shade and local identity as native trees like Hoop Pines, Flame trees, native figs and riparian forest red gums.</li> </ul>	



## CHAPTER 4, DELIVERY MEASURES THAT MATTER

The AILA strongly supports ShapingSEQ's Delivery Measure 8 that promotes the Queensland Urban Design and Places (QDAP) Panel advice.

We consider that South East Queensland has an opportunity to lead the world in subtropical design. Therefore, there is an opportunity for ShapingSEQ to facilitate (and allocate appropriate funding for) the development of a subtropical design manual, which could, for example, be managed and led by QDAP. This would need to be underpinned by the involvement of the academic/research sectors, industry and the professions, including the AILA. The Subtropical SEQ Design Manual should include specific guidance on streetscape (possibly a revised form of "Complete streets" IPWEAQ 2010) design in middle (infill) and high density dwelling forms that includes innovative layouts and spaces above, at and below ground to support multipurpose tree cover (and can be easily adopted by local government planning schemes as new standards for infrastructure design planning scheme policies). The manual should encourage Local Authorities to have their own Design Review Panels and strategic planning linking ShapingSEQ aspirations and the Design Manual to the local level.

We support the "Urban Greening" implementation action. As part of this we would particularly support the inclusion in ShapingSEQ of the following actions:

- **A regional "Neighbourhood Shadeways" initiative** that offers incentives\* for local government (and their partners) to:
  - identify priority locations for improving tree shade along walking and cycling paths to school, shops, train station, bus station and local parks
  - achieve (and require of adjacent developments, upgrade projects) at least 50% tree shade cover within 400m (5 min walk) of those priority locations within the life of the SEQ plan
  - develop innovative and integrated outcomes beyond shading and cooling, towards utilising stormwater runoff, traffic management, a sense of place and participatory planning
  - involve local community in the shade tree planting and early care and monitoring

\*examples of incentives to achieve this include, for example, funding/grant support, development of a "Neighbourhood Shadeway" pack/facilitation support, state govt. (DEH, DLGIP) website for registering projects and promoting progress, etc.

- **Regional trials of "Tree Space" technologies** to support best practice in designing, installing and maintaining cost-effective surface and sub-surface treatments for delivering large, long-lived, healthy trees in paved areas. e.g. structural soils, structural cells, WSUD street trees, suspended pavements, permeable pavements, etc. These should also determine measures for managing risk / maintenance of tree canopy through irrigation etc. to minimise and mitigate risk.
- **A Regional Recreation Strategy** with associated target for the provision of Regional trails – measures would, for example, include total km, standard and connectivity to activity centres and or recreation destinations of choice (for walking, cycling, horses etc.)
- **Targets for the delivery of publicly accessible outdoor open space** (not just "Public Open Space") including beaches & esplanades, rivers, lakes, reservoirs and other waterfronts; urban spaces (even if 'private' such as golf courses etc.) – measures would, for example, include total area, accessibility, degree to which they contribute to liveability, 'remoteness' (similar to the ROS categories) and usage. This should be classified in two categories – terrestrial and waterways. Rate of Provision of



Publicly Accessible Open Space should be established (as per the system employed in the United States)

- **Outdoor recreation survey (biennial)** – measures such as participation rates, range of recreational opportunities etc.
- **A comprehensive Identification of Landscape values** – not just “scenic amenity” (which AILA considers is not achieving the desired protection of scenic amenity for our region and communities) but also character / place values, sensitivity, accessibility and heritage.
- **Contribution to wider green infrastructure networks, establishing and reinforcing non-urban inter-urban breaks, corridors and ecosystem networks** – measured against an identified goal for green infrastructure across the region. Inter-urban break additional policy – spatial. This should include mapping of additional regional breaks e.g. Sheldon; Bald Hills Flats- to be mapped on the Regional Map and Policies. ShapingSEQ should place requirements on Local Governments to designate and show how they are protected.

#### REFERENCES:

- AILA (2015) 15 year Infrastructure Plan for Australia: Submission by Australian Institute of Landscape Architects (AILA). Retrieved from [http://www.aila.org.au/imis\\_prod/documents/AILA/VIC/AILA\\_Infrastructure%20Australia\\_submission%202015.pdf](http://www.aila.org.au/imis_prod/documents/AILA/VIC/AILA_Infrastructure%20Australia_submission%202015.pdf).
- Brisbane City Council (2015) River’s Edge Strategy, Lat27. Retrieved from <https://www.brisbane.qld.gov.au/sites/default/files/rivers-edge-strategy-sept-2013.pdf>
- City of Gold Coast (2014) Gold Coast Landscape Character Study, Cardno. Retrieved from <http://www.goldcoast.qld.gov.au/documents/bf/landscape-character-study.pdf>
- City of Gold Coast (2016) Burleigh Heads Village Character Study, Lat27
- Daniel, C., T. H. Morrison and S. Phinn (2016). The governance of private residential land in cities and spatial effects on tree cover. *Environmental Science & Policy* 62: 79-89.
- Plant, L. and N. Sipe (2016). Adapting and applying evidence gathering techniques for planning and investment in street trees: A case study from Brisbane, Australia. *Urban Forestry & Urban Greening* 19: 79-87.
- Queensland Government (2016), Department of Infrastructure, Local Government and Planning.
- Shanahan, D. F., B. B. Lin, K. J. Gaston, R. Bush and R. A. Fuller (2014). Socio-economic inequalities in access to nature on public and private lands: A case study from Brisbane, Australia. *Landscape and Urban Planning* 130(0): 14-23.
- Wang, D., G. Brown and Y. Liu (2015). The physical and non-physical factors that influence perceived access to urban parks. *Landscape and Urban Planning* 133(0): 53-66.



## **NEXT STEPS**

AILA looks forward to the findings of the current ShapingSEQ consultation and to a response to the issues we have raised. If clarification of any of the issues raised is required, please let us know. Representatives from our membership would also be willing to meet with you or your colleagues on specific methodologies and issues going forward if this would be of assistance.

Should you have any queries or wish to discuss, please contact Georgina Scriha, AILA Queensland Chapter Manager on 0417 666 622 or [georgina.scriha@aila.org.au](mailto:georgina.scriha@aila.org.au).

Yours sincerely,

A handwritten signature in black ink that reads "Amalie Wright". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

**Amalie Wright**

AILA Queensland State President