



11 September 2020

Peter Tabulo
General Manager Planning and Regulatory
Ipswich City Council
PO Box 191
Ipswich QLD 4305

BY POST/EMAIL – council@ipswich.qld.gov.au

Dear Mr Tabulo,

RE: Draft Natural Environment Policy

The Urban Development Institute of Australia Queensland Ipswich Branch (the Institute) writes to Ipswich City Council (council) on the draft Natural Environment Policy (draft policy). We welcome council's wish to establish a policy outlining the city's overarching position and direction for the natural environment.

The Institute understands that the draft policy, once finalised, will be one of council's key strategic documents and will be used to guide and inform environmental principles in the new planning scheme. We note council's goal for the natural environment is to: "*conserve important areas of native habitat, protect important waterways and enhance their water quality and respond to climate change and use resources prudently (Corporate Plan 2017-2022).*"

The new policy will set-out a strategic position and principles to achieve this goal. The Institute considers conserving and protecting the region's core habitat, native vegetation, and waterways is essential for ecological purposes and to achieving a standard of liveability and amenity the community expects. However, a considered approach is required to enable the community to access diverse and affording housing in the region.

The discussion paper notes that catering for housing demand is one of the challenges to managing the natural environment. While the discussion paper highlights that there are opportunities to mitigate some of these risks, it does not identify what these opportunities are. The Institute believes this needs to be addressed as council finalises the draft policy.

It is important to note that the South East Queensland Regional Plan 2017 (*ShapingSEQ*) has considered these issues and anticipates that the Ipswich region will accommodate an additional 319,900 people and 111,700 dwellings by 2041. From the Institute's experience, achieving environmental outcomes alone without considering housing outcomes will compromise both objectives, and provide the community with little certainty around preserving the environment and affordable housing.

ShapingSEQ includes reference to natural assets and biodiversity, including the following:

"SEQ's biodiversity, natural assets and regional landscapes are protected and nurtured to sustain our region's strong and diverse communities. These communities are safe, fair, sustainable, resilient and prepared for climate change."

"The regional biodiversity network is protected and enhanced to support the natural environment and contribute to a sustainable region."

We encourage council to think strategically about the region's natural environment and develop a sustainable corridor approach that balances the preservation of natural assets and continues to provide diverse housing options for a growing population.

Local government has a fundamental role in ensuring the community has access to affordable housing and, as we understand, is a key priority for this council. Recognising this, we highlight that a thriving balance between preserving the natural environment and having affordable housing accessible is desirable.

The draft policy needs to be pragmatic in achieving its overall objectives to preserve and improve the region's natural environment. The Institute views that the draft policy needs to be strategic in its approach in identifying environmental corridors throughout the region. This must be viewed in the context of the region's ability to accommodate future population growth and the capacity to deliver the necessary housing to meet this need.

With this in mind the following principles are proposed:

- Principle 1: Prioritise conservation measures toward strategic, safe habitat areas separate from urban development areas
- Principle 2: In balancing natural assets and dwelling supply, impacts on land supply should be minimised and compensatory responses made to any potential decreased dwelling supply
- Principle 3: Development rights in the Urban Footprint should be preserved
- Principle 4: Industry consultation is undertaken on any proposed changes to zoning or other mapping and a mechanism is provided to allow landholder-led mapping corrections.
- Principle 5: Review of environmental layers, policies and rules to remove duplication and ensure there are consistent arrangements for the industry which do not result in housing affordability pressures.

The draft policy discussion paper has outlined what the region's natural environment encapsulates, including the values attached to the natural environment, however, needs to further address how council will be able to balance both the environmental outcomes and delivering communities.

The Institute strongly recommends council, in its next steps, collaborate with the industry in developing the draft policy considering the key aspects surrounding environmental outcomes and council's obligations to meet dwelling targets under *ShapingSEQ*.

Thank you for the opportunity to provide comments during this consultation. We would welcome further engagement on this item. If you have any questions, please contact Policy Executive, Robert Tily (rtily@udiaql.com.au) on (07) 3229 1589.

Yours sincerely,
Urban Development Institute of Australia Queensland

A handwritten signature in black ink, appearing to be 'S Burgess', written in a cursive style.

Sam Burgess
Ipswich Branch President

CC: Darryl Porche
Senior Planning Officer (Strategic Conservation Planning)
darryl.porche@ipswich.qld.gov.au