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ENVIRONMENT
INSTITUTE OF
AUSTRALIA AND
NEW ZEALAND

DLGPSR

Dynamic Planning for a Growing State

IPA/IDAS Improvement Project

Reply Paid 15031

City East Q 4002

Dear Sir/Madam

**Dynamic Planning for a Growing State - Discussion Paper
Submission by the Environment Institute of Australia and New Zealand Southeast Queensland Division**

Introduction

The Environment Institute of Australia and New Zealand (EIANZ) supports the current review of the *Integrated Planning Act 1997* (IPA) and the Integrated Development Assessment System (IDAS), and that the review is being undertaken in a consultative manner. We welcome the opportunity to provide our comments on the proposed key strategies to help improve the IPA and IDAS.

Overall Position

In our 2006 submission to the Department on the initial IPA review, we provided a range of general and specific comments. We acknowledge that a number of the comments that the Institute raised have been considered in this latest review, however we maintain our overall position that IPA is not leading to good environmental outcomes and that the focus of this, and previous reviews, seems to be on improving planning outcomes and procedural outcomes, rather than environmental outcomes.

With the aim of IPA being “...to deliver integrated planning that enables sustainable development to proceed...”, the Institute sees the need for more fundamental changes rather than continual minor ‘tweakings’ of the legislation as we have seen in recent years.

Comments on Discussion Paper

Stakeholder Involvement

The discussion paper lacks an overall discussion on community involvement, with much of the focus being on industry stakeholder consultation. Whilst consultation with stakeholders is important, the strategies seem to be for the purposes of understanding IPA/IDAS better rather than understanding and improving, through IPA, the important contribution community consultation makes in achieving sustainable development.

The improvements identified in Strategy 1 are generally supported and the short-term timeframes are welcomed. The communication plan seems to be focussed on government stakeholders and the need to improve information channels and getting stakeholders to understand their role in the process. We also believe there is too much emphasis on stakeholders engaging with the IPA and IDAS as opposed to engaging with the community.

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The Department needs to further understand and appreciate the contribution of the community in sustainable development through planning, and focus more on implementing strategies for facilitating greater collaboration between the community, planners and developers.

With respect to Strategy 2, if DLGPSR are to assume a stronger leadership role, they need to have the funding and expertise to assume this role, both of which have largely been absent since the inception of IPA. The perception of the organisation by local government, other State agencies and the development industry is poor and needs to be strengthened.

As a strategy to implement this action it is suggested that experienced professional local government, State government and private sector planners and development assessment officers be offered secondments to the Department to assist with the change management process. When they are returned to their member organisations, they will have had a chance to take some ownership of the integration challenges IPA is trying to address.

State and Regional Planning

The regional plan model used with the SEQ Regional Plan has been a positive innovation and extending this model to other areas of Queensland is supported by the Institute. Key issues with the model that need to be further discussed and resolved include.

- Scope of the Plan – at its most fundamental level, the SEQ Regional Plan is a planning scheme for the region, with its purpose managing growth in the form of new development (eg. material changes of use and reconfiguring of a lot). While this is an important function, it does not address the range of other issues happening in the region for which the plan has no real statutory role (managing the existing use of land such as agriculture, resource allocation, etc.). To overcome this, it is suggested that as a first step there should be much closer integration (legislative links) required with NRM plans and investment strategies prepared as part of NAP and NHTII. Investment under these programs should be integrated with planning aims and priorities set out in regional growth plans. The State shouldn't approve or provide matching funding to NRM plans unless this integration is achieved.
- Integration with other State Planning Policies and State interests- The regional planning model as evidenced with the SEQ Plan appears robust enough to deal with the full range of State interests (identified as part of an SPP or as the more ubiquitous State interest as defined in IPA). As a further push toward reducing the complexity of the planning system, the idea of the Regional Plan replacing the need to consider other State planning policies (or repealing them to the extent that they are addressed in the Regional Plan) in the area where the plan operates should be considered. This will increase the importance and emphasis on agencies such as the QEPA and DNRW getting their State interests incorporated into regional plans but will make planning scheme preparation and IDAS much simpler for the end user. A single planning agency like the OUM – utilising the expertise of other agencies in preparing and implanting a single plan is a very desirable planning outcome in Queensland given the proliferation of plans in the past few years.

Building Capacity

The Discussion Paper is successful in identifying a number of major capacity issues in the planning profession, including a lack of planning professionals in local government, the need for greater mentoring and training of planning staff. The proposed strategies seem appropriate and the Institute supports this approach.

Recommendations

In reading the discussion paper, there does not seem to be much, if any, discussion of how similar legislation operates in other jurisdictions. Both New Zealand and New South Wales have integrated planning legislation akin to IPA that has been operating for similar time periods. The Institute believes it would be beneficial that the positive and negatives of similar legislation operating in other jurisdictions be explored as follow-on tasks from this recent review.

Overall, the Institute encourages more effort on a focus of improving the mechanisms for better environmental outcomes as apposed to greater efficiencies for administrative implementation as currently sought from the proposed strategies within the Discussion Paper.

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Yours sincerely

Policy Subcommittee, EIANZ SEQ Division