



Economic & Public Policy

Submission to Office
of Urban Management

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DRAFT SOUTH EAST QUEENSLAND REGIONAL PLAN

1. Introduction

The *Draft South East Queensland Regional Plan* released by the Queensland Government on 27 October 2004 has potentially far-reaching consequences for transport policy, anti-congestion policy and roads funding in South-East Queensland. The influence of the final version of the plan will presumably be reflected in the nature, location and extent of transport expenditures included in the complementary infrastructure plan to be released in April 2005. Unfortunately, unavailability of a draft infrastructure plan when the *Draft South East Queensland Regional Plan* was released made it difficult to comment constructively on the latter.

The draft regional plan nominated an effective integrated transport system as one of seven desired regional outcomes. Ten of the 73 pages of text were dedicated to this matter. Also, transport issues were mentioned in various other parts of the document.

Indeed, the draft regional plan pre-empts future transport policy by treating pursuit of higher density urban growth and greater use of public transport as important ends (objectives of policy), rather than as two among many potential means to an end (strategies).

It is obvious that the final version of the *South East Queensland Regional Plan* will substantially affect the two-thirds of RACQ's one million members living in the south-east corner of the state, not only as road and public transport users, but also as residents, and contributors to and beneficiaries of the transport-dependent regional economy.

This submission is the RACQ's response to the Queensland Government's invitation to comment on the *Draft South East Queensland Regional Plan* by 28 February 2005.

RACQ's submission analyses the draft plan from a broad public interest perspective, rather than from a narrow motoring perspective. RACQ endorses the Queensland Government's decision to base the draft plan on public interest principles of sustainable development. Therefore, this submission uses those principles as criteria for assessing the draft plan.

2. Background

South-East Queensland has experienced relatively high rates of population and economic growth over the past 20 years. This has placed great pressure on the

region's natural resources and infrastructure, generating substantial community concerns about consequential issues such as worsening traffic congestion, deficient public transport services, long waiting times to access government health services, and adverse effects on natural resources. At the same time, urban planners have expressed concern about various perceived consequences of urban sprawl around Brisbane, the Gold Coast and Sunshine Coast.

Transport issues arising from strong growth in the south-east corner of the state were previously addressed in the *Integrated Regional Transport Plan for South East Queensland* in 1997 and the complementary *Transport 2007: An Action Plan for South East Queensland* in 2001. These documents focused strongly on worsening traffic congestion.

The Queensland Government's broad approach in these plans was:

- minimal increases in road capacity to major activity centres so that increasing congestion provides an inducement to change travel behaviour;
- substantial reallocation of government funds from roads to public transport subsidies, including provision of bus-ways and rail capacity upgrades;
- reallocation of some road lanes to bus/high occupancy vehicle lanes (another form of public transport subsidy) to improve the attraction of ride-sharing and buses relative to single occupant vehicles;
- tolls on some new by-pass road capacity (eg, Gateway Bridge duplication and Motorway upgrade, and North-South By-Pass), which release government funds for public transport subsidies;
- information programs to encourage mode-change;
- higher parking costs; and
- better targeting and coordination of land-use and transport planning.

Traffic congestion in South-East Queensland has worsened substantially since release of these plans.

Preparation of the *Draft South East Queensland Regional Plan*, public consultation, consideration of comments and finalisation of the plan are required by Section 2.5A.13, 14 and 15 of the *Integrated Planning Act 1997*, as amended in 2004. While the draft plan is legally an urban and regional planning document, it is also a *de facto* transport policy document. Indeed, a number of the key strategies in the draft plan seem to have an anti-congestion focus. But, paradoxically, the document does not directly address the serious and worsening problem of congestion, which is one of the more disturbing consequences of past government failure to adequately cater for relatively rapid growth of population and economic activity in South-East Queensland.

The *South East Queensland Regional Plan* will take precedence over other planning instruments. Material inconsistencies with the Plan in local government planning schemes will have to be eliminated.¹

¹ Queensland, *Draft South-East Queensland Regional Plan*, Brisbane: Office of Urban Management, October 2004, p. 4.

The Government intends to undertake a formal review of the *South East Queensland Regional Plan* every five years.²

To complement the Regional Plan, the Government is preparing a *South East Queensland Infrastructure Plan and Program*. It is due for completion in April 2005.

A draft infrastructure plan should have been released at the same time as the *Draft South East Queensland Regional Plan*, because the appropriateness of the latter cannot be properly assessed in the absence of the former.

3. Purpose and Principles underlying the Regional Plan

The Government said, “The overriding intent of the Regional Plan is to ensure that the region can grow and change in a sustainable way, generating prosperity while at the same time maintaining and enhancing quality of life and providing high levels of environmental management.”³ The intent is laudable.

The *Draft South East Queensland Regional Plan* was said to be based on ecologically sustainable development principles in the *Integrated Planning Act 1997* and the *National Strategy for Ecologically Sustainable Development*.⁴

RACQ believes that sustainable development principles, if properly interpreted, provide appropriate criteria to formulate and assess the regional plan. Unfortunately, the draft regional plan contains minimal analysis showing how the key thrusts of the document are based on these principles. The link between key major elements of the draft regional plan and sustainability principles is tenuous or non-existent.

4. New Regional Planning Approach

The *Draft South East Queensland Regional Plan* proposed “a new regional planning approach”:

- consolidation of urban development within “the urban footprint”, which incorporates land considered to be required for urban development to 2026;⁵
- prohibition of urban development outside “the urban footprint”;⁶
- protection of inter-urban breaks to separate and frame discrete urban settlement areas;⁷
- a more compact urban form with higher densities in selected areas;⁸

² Ibid.

³ Ibid, p. 5.

⁴ Ibid, p. 16.

⁵ Ibid, pp. 13, 28, 31.

⁶ Ibid, p. 28.

⁷ Ibid.

⁸ Ibid, p. 11, 28.

- a progressive increase in the proportion of new dwellings to be provided through infill and redevelopment of existing urban areas;⁹
- higher density and mixed-use development to be focused on Regional Activity Centres (RACs), and public transport nodes, including potential Transit (public transport) Oriented Development (TOD) sites, to facilitate an “efficient public transport system”;¹⁰
- RACs to be strengthened through incorporation of major employment activities, government and community service centres and other trip generating activities, and provision of “appropriate transport infrastructure”;¹¹
- major new greenfield residential developments to have a minimum net density of 15 dwellings per hectare compared to 8-11 per hectare now, to support public transport services;¹²
- improved public transport infrastructure and services to support increased densities, particularly around transport nodes;¹³
- constraints on rural residential development;¹⁴
- relief of pressure on the coastal environment by encouraging regional growth in the south-western corridor, particularly in the Ripley Valley south of Ipswich where a Regional Activity Centre will be established;¹⁵
- managing and guiding growth through integration of land-use and transport planning, timely provision of infrastructure in accordance with a *South East Queensland Infrastructure Plan and Program*, and provision of employment creation assistance;¹⁶
- additional supply of “affordable housing well located in relation to services, open space and employment” through regulation of developments, greater competition among developers, support for not-for-profit entities and housing co-operatives, and ensuring adequate supplies of land for urban development.¹⁷

5. Associated Transport Proposals

The Government wants to ensure transport investment produces the maximum benefit to the community.¹⁸ The Government says it will “explore all available options to

⁹ Ibid, p. 11, 29.

¹⁰ Ibid, pp. 29, 31, 34.

¹¹ Ibid, p. 29.

¹² Ibid, pp. 8, 32.

¹³ Ibid, pp. 52-61.

¹⁴ Ibid, p. 28, 29, 32.

¹⁵ Ibid, pp. 8, 11, 37.

¹⁶ Ibid, pp. 8, 11, 62.

¹⁷ Ibid, pp. 43, 44.

¹⁸ Ibid, p. 53.

fund future infrastructureand identify the best delivery options and funding mechanisms for key infrastructure projects with due consideration to benefits, public interests and risk management.”¹⁹

Transport proposals in the *Draft South East Queensland Regional Plan* focused heavily on integration of land-use and transport planning, and inducing greater use of public transport. Particular attention was given to supporting proposed high density TOD sites and RACs with “priority public transport networks and services.”²⁰

These measures are supposed to support a more compact pattern of urban development.²¹ Apparently, it is perceived that improved public transport facilities and services would encourage higher densities while reducing the extra pressure on roads at peak times arising from increased density.

It is proposed to invest in public transport infrastructure and services to lead and support the preferred sequence and form of development²².

Investments in public transport will include:

- upgrading rail links between the Gold Coast, Brisbane and Sunshine Coast;
- bus priority measures across the network in Brisbane, a bus priority and high occupancy vehicle lane network for the Gold Coast, bus priority measures on east-west connections on the sunshine Coast, a Caloundra-Maroochydore “public transport spine” for a bus-way, and possibly rail at a later time;
- more bus-ways in Brisbane, including extension of the Inner-Northern Bus-Way to Queen Street bus station and Eastern and Northern Bus-Ways;
- new public transport corridors to link RACs and open up new public transport markets in the Brisbane metropolitan area, including a links between Darra, Springfield, the Ripley Valley and Ipswich in the south-west, and a Petrie to Redcliffe corridor.

Some of these public transport investments had been proposed by the Government previously. No time frames were provided.

The Government intends to give “priority...to planning” transport networks in the south-western corridor, “in particular, a multi-user infrastructure corridor that allows for road, standard/dual gauge rail and other infrastructure connections between the new industrial areas south of Ipswich and the industrial areas at Yatala.”²³

The most significant new road proposal is to “complete an orbital road system to complement an overall network of north-south and east-west arterial connections” for

¹⁹ Ibid, p. 63.

²⁰ Ibid, p. 53.

²¹ Ibid, pp. 52-55.

²² Ibid, p. 53.

²³ Ibid, p. 59.

the Brisbane metropolitan area. This includes, “consideration of a western by-pass”.²⁴ Subsequently, the Premier stated that a western by-pass must be provided.

Other significant new road proposals include improved east-west road connections on the Gold and Sunshine Coasts, upgrading and extension of the Sunshine Motorway, a possible southern extension of the Gateway Motorway, road network improvements in western Brisbane, and a second range crossing for Toowoomba.²⁵ Timing was not addressed.

The *Draft South East Queensland Regional Plan* did not include any proposals to upgrade road capacity to/from major activity centres in the Brisbane metropolitan area.

The Government proposes to “manage demand and change consumer behaviour to maximise the use and benefits of existing infrastructure and to minimise the need for additional projects and services”.²⁶ The draft plan does not provide a clear indication of its demand management strategy. However, it appears it will include some form of parking management in RACs and the Brisbane cbd,²⁷ more capital subsidies for public transport,²⁸ and marketing/information campaigns of some sort.²⁹ Congestion charges were not mentioned.

6. Assessment of Draft Regional Plan

6.1 Objectives and Criteria

The Queensland Government claimed that *Draft South East Queensland Regional Plan* was based on ecologically sustainable development principles in the *Integrated Planning Act 1997* and the *National Strategy for Ecologically Sustainable Development*.³⁰

Sustainable development or sustainability principles gained wide appeal after contemporary interest in the concept was triggered by a report released by the United Nations World Commission on Environment and Development (UNWCED) in 1987.³¹ In response to the UNWCED report and the subsequent United Nations Conference on Environment and Development in Rio de Janeiro in June 1992, the Council of Australian Governments (COAG) endorsed a *National Strategy for Ecologically Sustainable Development*.³² Subsequently, the Queensland Government decided that the purpose of the *Integrated Planning Act 1997* would be “to seek to achieve ecological sustainability” (sub-section 1.2.1). The definition of “ecological

²⁴ Ibid, p. 60.

²⁵ Ibid, pp. 56-60.

²⁶ Ibid, p. 63.

²⁷ Ibid, p. 53.

²⁸ Ibid, pp. 52-60.

²⁹ Ibid, p. 53.

³⁰ Ibid, p. 16.

³¹ Brundtland, G.H. and others, United Nations World Commission on Environment and Development, *Our Common Future*, Australian Edition, Melbourne: Oxford University Press, 1990.

³² Council of Australian Governments, *National Strategy for Ecologically Sustainable Development*, Canberra, 7 December, 1992, www.deh.gov.au/esd/national/nsesd/strategy.

sustainability” in sub-sections 1.3.3 and 1.3.6 of the Act drew heavily on the definition of sustainable development provided by UNWCED and principles in the *National Strategy for Ecologically Sustainable Development*.

Properly interpreted sustainable development principles simply re-package the widely accepted concepts of efficient allocation/use of resources and equity, with renewed emphasis on intergenerational efficiency and equity and internalisation of costs of externalities, like pollution and traffic congestion.³³ Efficient allocation of resources and equity are sensible criteria for formulating and assessing a regional plan.

The concept of sustainable development has wide appeal. It has been embraced by groups that have typically held widely divergent views about the conservation and use of natural resources, the allocation of resources in the economy and over time, and the distribution of income and wealth within and between generations. However, traditional conflicts have been masked to some extent by various groups within the community interpreting the sustainability concept or emphasising particular aspects of it in ways that coincide with their own particular interests, preoccupations or ideologies.

While properly interpreted sustainability principles provide a sensible basis for formulating the regional plan and appropriate assessment criteria, many of the repeated references to sustainability in the *Draft South East Queensland Regional Plan* seem to be just lip-service.

Instead of the focus being on improving the efficiency of resource-use and equity, as one would expect if sustainability was properly interpreted and applied, the draft plan focused heavily on achieving higher density urban growth via regulation, and greater use of public transport through more capital and operating subsidies. No explanation was provided as to how these strategies would improve economic efficiency and equity, and how they compare with various alternative strategies.

Worse still, the draft plan incorrectly treated proposals to increase urban density and use of public transport as ends (objectives of policy), rather than as potential means to an end (strategies). This appears to have been based on either severely flawed “smart growth”/“new urbanism” planning ideology or the false premise that these strategies are reasonable proxies for objectives of economic efficiency and equity.

The neglect of efficiency is exemplified by the avoidance of South-East Queensland’s traffic congestion crisis, which Bureau of Transport and Regional Economics forecast would impose huge costs on the Australian economy over the next decade.³⁴ The neglect of equity is exemplified by the complete disregard for the middle-class welfare aspect of public transport subsidies,³⁵ and the extra taxes or foregone

³³ Willett, Ken, *Managing Australian Mineral Wealth for Sustainable Economic Development*, London: Mining, Minerals and Sustainable Development Project, International Institute for Environment and Development, January 2002, chapter 2.

³⁴ Gargett, David and Cosgrove, David, *Urban Transport – Looking Ahead*, Information Sheet 14, Canberra: Commonwealth of Australia, Bureau of Transport Economics, 1999.

³⁵ Centre for International Economics, *Subsidies and the Social Costs and Benefits of Public Transport*, Canberra: Centre for International Economics, March 2001, p. 50; Cox, John, “Labor stops ‘common people’ people from moving around”, *The Australian Financial Review*, 20 June 2003, p. 83.

expenditure to pay for the subsidies. It is also exemplified by conflict between some aspects of the draft plan's proposals and the government's desire to increase supply of affordable housing.

The Integrated Transport chapter of the draft plan placed strong emphasis on public transport on the basis that it supports increased densities, especially around transport nodes.³⁶ Elsewhere, the document argued that greater urban density was desirable because it would support more viable public transport services.³⁷ So, public transport was pushed because it supports higher urban density and higher density was advocated to support public transport. Two potential strategies have been converted into objectives and justified by circular reasoning.

No clear explanation was provided as to what these strategies are meant to achieve, other than support each other. If they are meant to alleviate traffic congestion, no analysis was provided to indicate how effective they might be.

6.2 Analysis of Regional Issues and Opportunities

The analysis of "regional issues and opportunities" in Part B and elsewhere in the *Draft South East Queensland Regional Plan* does not provide a convincing basis for the principal thrusts of the draft plan. The analysis is remarkably brief and disappointingly superficial.

The draft plan observed that continuation of high population growth rates experienced in South-East Queensland since the mid-1980s would impose significant pressures on natural resources, economic and social systems and governments, as well as creating opportunities for residents.³⁸

The draft plan did not discuss opportunities arising from continuation of rapid population growth, even though a chapter heading suggested otherwise. This was a major oversight, because employment and educational opportunities will be critical for reducing leakage of motor vehicle trips from the vicinity of RACs, TODs and new development areas like the Ripley Valley.

The document questioned the sustainability of the region and the way resources, particularly land, water and energy, are used.³⁹

The document asserted that many of the region's growth pressures derived from more rapid settlement along the coast than inland, very low urban densities, and fragmentation of rural and bush land by rural residential development. It asserted, "this trend pattern of development is not sustainable".⁴⁰ But, extremely limited evidence was provided to support assertions regarding un-sustainability.

³⁶ Queensland, *Draft south East Queensland Regional Plan*, op cit, pp.52-61.

³⁷ Ibid, pp. 8, 11, 34.

³⁸ Queensland, *Draft South East Queensland Regional Plan*, op cit, p. 6.

³⁹ Ibid.

⁴⁰ Ibid, p. 7-8.

One sentence referred to community debate about loss of open space, water quality and supply issues, traffic congestion, inadequate public transport and electricity supply.⁴¹ There was no supporting analysis.

Another sentence stated that “greenfield” urban development in the region is yielding 8-11 lots per hectare, while a minimum density of 15 lots per hectare is required to support a reasonably frequent bus service.⁴² But, detailed analysis of the relationship between residential density and public transport usage revealed that nett residential densities in the range of 17 to 37 dwellings per hectare are required to support moderately convenient public transport services.⁴³

The draft regional plan also alleged that low-density development involved higher costs of service provision and consumption of more land.⁴⁴ This is correct when comparing low and higher density urban fringe development. Also, fringe development consumes more land than re-development in established areas. But, it is unclear whether or not new fringe developments involve higher infrastructure costs than high density re-development activities.

There was no discussion of the relative costs of provision of infrastructure for “greenfield” urban development and upgrading of infrastructure to support urban redevelopment or infill activities that increase density. Yet, there are circumstances in which upgrading of infrastructure in established areas is more expensive than the provision of new infrastructure in “greenfield” areas.⁴⁵ Consequently, the Productivity Commission stressed the importance of governments assessing and making public the relative costs of providing infrastructure for new developments on urban fringes and upgrading existing infrastructure to support increased density in established areas before finalising their urban development plans.⁴⁶

The draft plan focused on the opportunity cost of land in urban-use, but ignored its value for urban purposes. It did not include a comparative analysis of the social value of land as back yards in suburbia or as privately owned farm/grazing lands or other privately or publicly owned open space on the fringes of suburbia. No attempt was made to distinguish between the amenity and environmental values of pristine bushland and degraded and/or marginal farm lands, such as those growing sugar cane between Nambour and Maroochydore and near Beenleigh. The draft plan neglected the economic efficiency principle of allocating land to its highest value use from a community perspective.

⁴¹ Ibid, p. 6.

⁴² Ibid, p. 8.

⁴³ Downs, Anthony, *Still Stuck in Traffic: Coping with Peak-Hour Traffic Congestion*, Washington, DC: Brookings Institution, 2004. p. 127.

⁴⁴ Queensland, *Draft South East Queensland Regional Plan*, op cit, p. 32.

⁴⁵ O’Toole, Randall, “The Folly of ‘Smart Growth’”, *Regulation*, Fall 2001, p. 25; Wood, Alan, “We’re urban sprawlers, so don’t cramp our style”, *The Australian*, 27 April 2004.

⁴⁶ Commonwealth of Australia, Productivity Commission, *First Home Ownership*, Inquiry Report No. 28, 31 March 2004, <http://www.pc.gov.au/inquiry/housing/finalreport/housing.pdf>, p. 136.

The adverse consequences of past under-provision of infrastructure were not addressed. Similarly, the well-documented role of infrastructure in facilitating economic growth was not discussed.

The adverse effects of past and ongoing under-pricing of services of over-stressed facilities in the context of rapid population growth were not discussed.

A puzzling aspect of the *Draft South East Queensland Regional Plan* is that it does not directly address the problem of traffic congestion in South-East Queensland, despite warnings from the Bureau of Transport and Regional Economics and Brisbane City Council regarding a looming congestion crisis and consequent high economic, social and environmental costs.⁴⁷

Congestion-relief was not included among seven “desired regional outcomes” discussed in the document. Also, only passing reference was made to this problem in discussion of the “desired regional outcomes”.

Congestion was mentioned in the Regional Issues and Opportunities section of the draft plan only as a topic of recent community debate. The Urban Form chapter of the draft plan did not mention congestion. In the 10-page Integrated Transport chapter, congestion was mentioned just four times. On each occasion it was referred to fleetingly. The brief references to congestion related to:

- 1) one of a several “negative impacts” of transport that “must be managed effectively” (p 52);
- 2) an issue alleviated by “a reliable public transport system” (p 55);
- 3) a “major problem” in peak tourism periods at popular locations on the sunshine Coast, but one being overcome by “innovative transport solutions” that are “offsetting the need for major road improvements” (p 57);
- 4) a problem that an orbital road system would help manage in Brisbane (p 59).

There seemed to be an extreme reluctance to acknowledge in the draft plan the existence of the serious and worsening problem of traffic congestion in South-East Queensland. Consistent with this, the draft regional plan contained no analysis explaining how the key thrusts of the plan, inducing greater density and use of public transport, would alleviate traffic congestion and thereby improve the efficiency of resource-use.

6.3 Planning Proposals

It is important to note that the principal obstacles to increased densities along major public transport and road corridors and in the vicinity of RACs are existing planning regulations, and “nimby” politics sustaining those regulations. In the absence of planning constraints, market forces would have led to increased density in the vicinity of major activity centres and access points to bus-ways, passenger rail lines and motorways servicing major activity centres. This in turn would have allowed provision of more frequent services and made public transport less reliant on subsidies.

⁴⁷ Gargett, David and Cosgrove, op cit; Brisbane City Council, *Transport Plan for Brisbane 2002-2016*, Brisbane, September 2003, p. 3.

If constraints can be eased now in the face of “nimby” politics, the effects are likely to be significant on a region-wide basis only in the medium to long term because population growth, which underpins housing demand, and redevelopment occur only incrementally.⁴⁸ Therefore, state and local governments will need to do much more than just ease constraints on higher densities to substantially improve the viability of public transport links and reduce regional congestion. Governments will need to force the pace to ensure that there is a very large number of TOD sites established quickly and the residential density surrounding each is very high.⁴⁹

Governments will also need to address other problems.

The issue of who bears the cost of upgrading infrastructure to cope with higher densities around RACs and access points to transport corridors will need to be addressed. This issue is complicated by:

- the potentially higher cost of upgrading or replacing established infrastructure than provision of infrastructure in “greenfield” areas, and
- the question, “Who bears the cost of upgrading existing infrastructure in established areas?”

There could be substantial leakages from high density TOD and RAC sites. Not everyone locating near those sites will work or study within the site or chose to use public transport to travel elsewhere at peak times. Leakages from density-increasing redevelopment and infill activity away from TOD and RAC sites are likely to be very high. Consequently, increased pressure will be placed on inadequate existing road infrastructure. In other words, local congestion is likely to worsen as density increases.⁵⁰

Because of timing and leakage issues with high density TODs and RACs and moderate density fringe developments, congestion will continue to worsen, unless governments are prepared to invest heavily in road infrastructure, particularly ring- and by-pass roads and local de-bottlenecking, in the short- to medium-term. They will also need to seriously plan implementation of congestion charges, the most effective demand management tool available and a source of revenue for the necessary road improvements.

The draft plan does not adequately address the conflict between the desire to increase the supply of affordable housing and proposals to constrain “greenfield” urban development and increase density. Constraining the supply of urban fringe land will push up the price of the land component of housing throughout major urban areas, as the Productivity Commission has explained.⁵¹

Focusing supply in relatively unattractive (in terms of distance, isolation and temperature) locations, like the Ripley Valley, and forcing higher density, which is less-preferred by consumers, in those locations will push up housing prices relatively

⁴⁸ Taylor, Brian, “Rethinking Traffic Congestion”, *Access*, No. 21, Fall 2002, p. 14.

⁴⁹ Downs, Anthony, *op cit*, pp. 400-401.

⁵⁰ *Ibid*, pp. 212, 399-401; Taylor, Brian, *op cit*, p. 15.

⁵¹ Productivity Commission, *op cit*, pp.123, 134, 135.

much more in other areas. It is also likely to lead to concentration of disadvantaged people in these relatively unattractive locations.

The housing affordability problem could be exacerbated by the higher costs of construction of multistorey dwellings and the potentially higher costs of infrastructure in TOD and RAC redevelopment areas, which could be passed on to new residents via developers.

6.4 Transport and Other Infrastructure Proposals

It is difficult to assess the credibility of transport infrastructure proposals in the draft regional plan and priorities attaching to different forms of infrastructure and different locations without any information on timing. It is frustrating that the Government will not provide delivery timeframes and other details until the *South East Queensland Infrastructure Plan and Program* is released in mid-2005.

Proposals in the *Draft South East Queensland Regional Plan* to integrate land-use and transport and other infrastructure planning are sensible.

The Government's proposal to "complete an orbital road system to complement an overall network of north-south and east-west arterial connections" including a western by-pass for the Brisbane metropolitan area would be a major step forward in tackling Brisbane's congestion problems.

It is not known if the Government's pledge regarding an orbital road system relates only to an outer-ring road system, which a western by-pass would complete, or if it also includes inner- and intermediate-ring-road systems, as advocated by RACQ. Completion of the outer ring-road system would be a good start, but much more is needed. A comprehensive system of inner-, intermediate- and outer-ring-roads is an essential component of an effective anti-congestion strategy for the Brisbane metropolitan area. As the draft report recognised, "Managing traffic within Brisbane requires quality orbital road systems. Orbital routes provide a by-pass for through traffic away from congested areas".⁵²

The draft report did not indicate whether or not the Government would toll the new orbital routes. However, it is very disappointing that the Queensland Government will apply tolls on a duplicated Gateway Bridge, maintain them on the existing bridge, and persist with tolls on Logan Motorway and the southern end of the Gateway Motorway. Similarly, Brisbane City Council's intention to toll its proposed *TransApex* tunnels, starting with the North-South By-Pass is discouraging.

Tolls on orbital and by-pass roads are poor policy for a number of reasons. One particularly pertinent reason is that they undermine the congestion-alleviating purpose of orbital roads. These reasons are discussed in section 7 of this submission.

Timing of provision of an orbital road system was not identified in the draft plan. However, it must be given priority to forestall Brisbane's looming congestion crisis.

⁵² Queensland, *Draft South East Queensland Regional Plan*, op cit, p. 59.

It is particularly important because of the proposal to focus the Brisbane metropolitan area's "greenfield" development in the south-western corridor, particularly in the Ripley Valley. This will place enormous pressure on existing transport infrastructure in a segment of the metropolitan area in which transport infrastructure is particularly inadequate. Ipswich Motorway, Centenary Highway, the Western Freeway, Moggill Road, Milton Road and Coronation Drive are already grossly inadequate. The longevity of proposals to upgrade the Ipswich Motorway would inevitably be cut substantially. A western by-pass and an intermediate western orbital road would be essential to relieve pressure on existing over-stretched roads in greater Brisbane's south-western suburbs.

While the draft plan promised "road network improvements in western Brisbane" no indication was given as to what or where they would be, other than the reference to a western by-pass.

Proposals to improve east-west road connections and improve local road networks on the Gold and Sunshine Coasts are welcome, but the timing and extent of these upgrades was not revealed.

The draft regional plan does not include proposals to increase road capacity to/from major activity centres in the Brisbane metropolitan area. This is a serious mistake.

This philosophy has been carried over from the *Integrated Regional Transport Plan for South East Queensland* (1997) and the complementary *Transport 2007: An Action Plan for South East Queensland* (2001). It is based on the argument that adding road capacity to serve major activity centres is futile and self-defeating because extra capacity will "induce" additional demand and the roads will quickly become congested again. The argument is flawed for several reasons outlined briefly below.

- Benefits provided by additional capacity are ignored.
- It ignores the distinction between redistribution or diversion of pre-existing travel movements within an area in the short term, and increases in travel demand in the area in the long-term, such as those arising from attraction of people and businesses to the area. Only the latter can properly be described as "induced demand" and only the latter could conceivably lead to network congestion as bad or worse than before the addition to road capacity.
- Recent research by Robert Cervero, Professor of City and Regional Planning at the University of California, Berkeley, found that 6-8 years after freeway expansion around 20 per cent of the added capacity had been preserved, around 40 per cent had been absorbed by traffic growth arising from population and income growth, about 31 per cent had been taken-up as a result of behavioural shifts, and 9 per cent because of land-use shifts. In other words, the argument that road capacity increases are futile and self-defeating is a gross exaggeration, even without any pricing of access.⁵³

⁵³ Cervero, Robert, "Are Induced-Travel Studies Inducing Bad Investments?", *Access*, No. 22, Spring 2003, pp 22-27.

- Proponents of the argument that adding road capacity is futile simply ignore the role that pricing can play efficiently rationing access to congested roads and thereby offsetting redistribution and growth of travel movements following additions to road capacity. A properly designed congestion-pricing regime would ensure that capital allocated to increasing urban arterial road capacity to alleviate congestion, and other resources associated with road travel are used efficiently, rather than being a futile or wasted.⁵⁴

The intention to support proposed high density TOD sites and RACs with “priority public transport networks and services.” is a step in the right direction. These sites will provide greater economies of scale, facilitate provision of better services and reduce subsidy requirements on relevant public transport routes. However, there are various issues with TODs and RACs that need to be resolved by governments. These are discussed in section 6.3, “Planning Proposals”, above.

Transport proposals in the *Draft South East Queensland Regional Plan* focus heavily on inducing greater use of public transport. They signal the Government’s intention to continue to give priority to public transport over cars in new transport expenditure (capital and operating subsidy) programs involving substantial expansion of bus priority and high occupancy vehicle lane networks in Brisbane, Gold Coast and Sunshine Coast. In other words, the reallocation of resources from roads to public transport can be expected to continue and may indeed be accelerated.

As economic analysis and overseas experience have shown, public transport subsidies are relatively ineffective and expensive anti-congestion devices. Public transport subsidies are also a form of middle-class welfare, because they favour those who can afford to live in close proximity to the better public transport services and work in the cbd. Therefore, public transport subsidies perform poorly in respect of the economic efficiency and equity criteria underpinning the principles of sustainable development that the Government said were the basis for the draft regional plan.⁵⁵

The Government wants to ensure transport investment produces the maximum benefit to the community.⁵⁶ However, the draft plan does not provide a clear indication of investment guidelines and assessment processes that will be applied to achieve this goal.

The Government proposed to “explore all available options to fund future infrastructureand identify the best delivery options and funding mechanisms for key infrastructure projects with due consideration to benefits, public interests and risk management.”⁵⁷ However, it did not indicate what assessment criteria and processes

⁵⁴ For a more detailed discussion of the “induced demand” issue and the role of congestion charges in managing it, see Downs, Anthony, op cit, particularly pp. 82-87 and 103-107.

⁵⁵ Parry, I.W.H., *Comparing the Efficiency of Alternative Policies for Reducing Traffic Congestion*, Discussion Paper 00-28, Washington, DC: Resources for the Future, June 2000, pp. 16-17; Centre for International Economics, op cit, pp. 29, 51; Hensher, David, *Urban Public Transport Delivery in Australia: Issues and Challenges in Retaining and Growing Patronage*, Bureau of Transport and Regional Economics Transport Policy Colloquium, Canberra, 3 October 2002, p. 2; Taylor, Brian, op cit, p. 13; Willett, Ken, “Huge Public Transport Subsidies Wrong Medicine for Congestion”, in “Perspectives”, *The Courier-Mail*, 15 September 2003; Downs, Anthony, op cit, pp. 345-346.

⁵⁶ Queensland, *Draft South East Queensland Regional Plan*, op cit, p. 53.

⁵⁷ Ibid, p. 63.

would be applied to achieve this objective, and no indication was given as to the Government's preferred option(s). The proposal is a dream. It is certainly not a tangible assessable strategy. Either the government doesn't know how it will fund the required infrastructure or it does not want to tell the public.

6.5 Demand Management Proposals

The Government has proposed to “manage demand and change consumer behaviour to maximise the use and benefits of existing infrastructure and to minimise the need for additional projects and services”.⁵⁸ The principle is sensible, but how the Government plans to do this or avoid the tough decisions is a matter for considerable concern.

The draft plan did not provide a clear indication of the Government's demand management strategy. However, it appears it will include some form of parking management in RACs and the Brisbane cbd,⁵⁹ more capital subsidies for public transport,⁶⁰ and marketing/information campaigns of some sort.⁶¹ But, parking measures do not deal with through-traffic, which in the case of Brisbane accounts for about 43 per cent of vehicles on roads to and from the cbd. And, public transport subsidies are relatively ineffective and expensive as explained above. Also, marketing/ information campaigns to get people out of cars just fiddle around the fringes of the congestion problem.

The Government is still dodging consideration of congestion charges, the most efficient demand management tool available. Not only would properly designed congestion charges deliver the benefits the Government is seeking (“manage demand and change consumer behaviour to maximise the use and benefits of existing infrastructure and to minimise the need for additional projects and services”), but also it will complement and enhance the effectiveness of an orbital road system and TODs and the viability and services of the public transport system, as well as delivering revenue to upgrade transport systems.

7. Economics and Politics of Tolls and Congestion Charges

Tolls

Brisbane City Council has proposed tolls on the *TransApex* tunnels and the Queensland Government intends to toll the duplication of the Gateway Bridge and Gateway Motorway upgrade to fund their construction and operation. Tolls are designed to cover costs of new facilities, including an attractive rate of return on investment. Tolls typically vary with vehicle-type, but not traffic volume.

The intention to apply tolls appears to be based on four factors.

⁵⁸ Ibid.

⁵⁹ Ibid, p. 53.

⁶⁰ Ibid, pp. 52-60.

⁶¹ Ibid, p. 53.

First, the Commonwealth Government will not accept responsibility for urban congestion. The Commonwealth's *AusLink White Paper* tells state and local governments wanting more congestion-alleviating road capacity to fund it from their own resources, charge tolls or let private sector road-providers do so.

Second, the Queensland Government won't fund more arterial road capacity to major activity centres because it has been misled by the argument that it is futile.

Third, toll-roads allow reallocation of Queensland Government and Brisbane City Council funds from roads to heavy public transport subsidies. Both governments have mistakenly adopted heavy subsidies for public transport as a key anti-congestion strategy.

Fourth, politicians do not want to raise taxes or cut other expenditure programs.

Building new toll-roads to alleviate congestion on the existing road system is seriously flawed policy. It appears that no level of government has adequately considered the equity and economic efficiency implications of this policy.

Tolls could be considered inequitable for multiple reasons. Various motoring taxes already cover the full costs of road-provision, and external costs of road-use, such as congestion.⁶² Tolls favour rich road-users. Tolls are extra imposts on motorists not fortunate to be able to drive in areas with adequate existing road infrastructure. So, tolls discriminate on the basis of geography and history. A significant ethical objection is that tolls apply to drivers who reduce costs on others by avoiding existing busy roads, and are dodged by those who stay on existing busy roads, adding to congestion and thereby imposing costs on others.

These equity/ethical objections to tolls could not be easily resolved.

Tolls discourage efficient use of resources. This occurs at peak and off-peak times.

A toll on a new road encourages drivers to stay on existing congested roads. So, the toll undermines the congestion-alleviating potential and efficiency of use of the new road. The higher is the toll, the greater is the consequent community welfare loss.

As vehicle numbers grow, with population, economic activity and incomes, the toll helps forestall emerging congestion on the toll-road. However, it simply shifts the problem to other locations, exacerbating congestion elsewhere.

A recent study of New York's tolled and un-tolled river crossings found that traffic grew 5 times faster on the un-tolled river-crossings, and therefore, congestion worsened dramatically at the ends of those un-tolled facilities.

Brisbane City Council plans to change general traffic lanes to bus lanes on Story Bridge when the North-South By-Pass tunnel is completed. Similarly, the Queensland Government apparently intends to switch general traffic lanes to bus

⁶² Cox, John, *Refocusing Road Reform*, Melbourne: Business Council of Australia, 1994, p. 150; Pender, Howard, *Taxing Cars: Fleecing the Fleet or Subsidising Smog?*, Sydney: Australian Tax Research Foundation, 1999, p. 48.

lanes when it provides the orbital roads proposed in the draft regional plan.⁶³ This means tolls on new by-pass roads will shift congestion onto facilities with reduced capacity. The combination of the toll and reallocation of existing road space will exacerbate congestion elsewhere.

At off-peak times, when the social cost of an additional vehicle using a road/ tunnel/ bridge is zero, a toll will induce some drivers to choose a less convenient alternative. The efficiency of use of the road is thereby reduced. The higher is the toll, the greater is the resulting welfare loss to the community.

Nearly 50 years ago, Nobel Laureate William Vickrey explained that applying tolls to roads built to alleviate congestion, while allowing free access to congested roads, was an “outstanding absurdity”.⁶⁴ It still is. Vickrey recommended charges apply only at congested locations in the road system, and application of the revenue to facilities providing alternatives to congested roads.

Congestion Charges

BCC and the Queensland Government politicians prefer to impose tolls on new facilities than apply congestion charges to manage demand on crowded arterial roads and fund an alternative network of free-access ring-roads in Brisbane’s outer, middle and inner suburbs. They have chosen a much less efficient and equitable option.

Congestion charges would apply only where and when congestion occurs in the urban road system. They would range from zero in free-flow conditions and vary with the degree of congestion. Congestion charges would vary between locations and times according to differences in congestion.

Properly designed congestion charges improve the efficiency of resource-use by making drivers bear congestion costs they impose on others, inducing them to alter their behaviour accordingly. This encourages changes in travel times, routes and modes and re-consideration of workplace and residential locations.

The better the alternatives to crowded roads, such as free-access by-pass and ring-roads and quality public transport, the greater is the reduction of congestion and the smaller the revenue-take. Poorer alternatives mean higher revenues, which can be used to improve available alternatives.

Congestion charges cut delays, fuel-use, vehicle emissions and crash risks. They facilitate better road system investments and use.

Congestion charges effectively manage so called “induced demand” from new roads in congested areas, fear of which has induced the Queensland Government to eschew provision of additional road capacity to major activity centres in Brisbane and other parts of south-east Queensland.

⁶³ Queensland, *Draft South East Queensland Regional Plan*, op cit, p. 59.

⁶⁴ Vickrey, William, “Some Implications of Marginal Cost Pricing for Public Utilities”, *The American Economic Review, Papers and Proceedings*, Vol. 45, No. 2, May 1955, p. 619.

Congestion charges trigger and perpetuate a cycle of higher demand for public transport, improving public transport services and viability, and further increases in demand for public transport. This yields savings in public transport subsidies.

These savings and revenue from congestion charges facilitate further economic gains. First, cuts could be made to taxes, like federal fuel and income taxes, which adversely affect the efficiency of use of resources. Second, investments can be made in ring-roads, by-passes and public transport facilities with high benefit/cost ratios. These investments will facilitate inducement of changes in travel behaviour by congestion charges.

There is a significant ethical issue reinforcing the strong economic efficiency case for congestion charges over tolls. Congestion charges apply to those imposing costs on others by using crowded roads, while tolls only charge drivers whose behaviour reduces congestion.

The main obstacle to implementation of congestion charges is political concern regarding acceptability and equity. One argument is that congestion charges favour the rich over the poor. Another is that road-users will object to paying for access to roads that were previously available free of charge.

The key to countering these points is the allocation of the revenue from congestion charges.

Allocation of the proceeds to servicing debt to finance a ring-roads, by-passes and public transport facilities with high benefit/cost ratios would increase the political palatability of congestion charges as well as increasing efficiency of use of resources, because road-users would be seeing value for their money.

Commonwealth tax cuts to make room for congestion charges could be the clincher. For example, lower fuel tax would particularly advantage low-income groups, who are more likely to travel further to work, drive across town rather than to the cbd, and own older, less fuel-efficient cars.

The role of the Commonwealth Government is critically important. Commonwealth tax cuts to make-room for state or local government congestion charges would not only make congestion charges politically acceptable, but also would provide an effective transfer of resources from the Commonwealth to other governments to fund congestion-alleviating facilities to complement congestion charges.

The Commonwealth Government must not be allowed to avoid responsibility for serious urban congestion problems, like those in South-East Queensland, because congestion is a national problem requiring a national solution.

Congestion chokes growth of economic activity in urban areas as well as traffic. Urban areas, particularly metropolitan areas, are major engines of economic activity and growth in the Australian economy. Therefore, congestion is a problem of national economic importance.

In addition, the Commonwealth controls the major tax bases, but state and local governments have a disproportionately large share of expenditure responsibilities (Australia's federal system is afflicted by vertical intergovernmental fiscal imbalance). Commonwealth tax cuts to make room for congestion charges would help to redress this imbalance.

PPPs

Public Private Partnerships (PPPs) increase shortcomings of road-tolls, relative to congestion charges. Provision of PPP toll-roads is poor public policy.

Government proponents claim PPPs can shift risks to private groups. But, the major risks associated with design, construction and performance could be shifted to private groups through a contract covering those matters.

In any event, private entities will accept PPPs only if compensated for risk. So, they insist on agreements restricting anti-congestion activities by governments, because toll-road profitability depends on continuing congestion on competing parts of the road system. Consequently, risk-shifting by government means more congestion on other roads and higher tolls to improve expected returns to private investors.

PPP agreements impede transition to economically efficient congestion charges and infrastructure provision. The more PPP toll-roads there are in the network, the more difficult the transition. Typical PPP terms of 30 to 80 years create longstanding impediments to effective congestion-alleviation.

In summary, PPP toll-roads and efficient congestion-alleviation are incompatible.

If toll-roads are government-owned, congestion-alleviation can take precedence over high returns on capital, and future transition to efficient anti-congestion strategies could be facilitated.

8. Correcting Congestion Alleviation Deficiencies in the Draft Regional Plan and Associated Transport Policies

The key to efficient alleviation of the serious and worsening traffic congestion problem in South-East Queensland is a package of complementary measures. There is no single remedy that is adequate by itself. The draft regional plan includes some components of an effective anti-congestion package, but neglected some critically important elements.

The package of measures recommended by RACQ comprises:

- a complete network of un-tolled outer, intermediate and inner ring-roads and by-pass roads for the Brisbane metropolitan area to take through-traffic (over 40% of the total) off radial roads to major activity centres;
- un-tolled by-pass road capacity to take through traffic around other major activity centres in South-East Queensland;

- selective increases in radial road capacity to major activity centres;
- congestion charges applying whenever and wherever roads are congested with charges varying with the degree of congestion;
- offsetting Commonwealth tax cuts;
- increases in road capacity to be:
 - completed before application of congestion charges; and
 - funded via government debt serviced by revenue from congestion charges;
- land zoning changes to -
 - allow substantial increases in residential and commercial densities around access points to major public transport corridors and major activity centres, and
 - require moderate increases in density in new land developments;
- a scaling down of public transport subsidies as congestion charges and zoning changes and consequential improvements in public transport services increase viability of the public transport system.

In formulating the package, RACQ focused on the social benefits and costs of various policy measures. RACQ formulated alternatives to government policies that are workable and satisfy widely accepted sustainability criteria, economic efficiency and equity.

9. Conclusion

While the *Draft South East Queensland Regional Plan* is supposedly based on sustainable development principles, several aspects of the draft plan are inconsistent with the key criteria/objectives of efficient allocation/use of resources and equity, which underpin the concept of sustainable development.

The draft plan confuses means with ends, converting two ideologically based strategies, pursuit of higher urban density and greater public transport use, into key objectives. Each was justified by reference to the other, rather than on the basis of rational analysis. Therefore, resulting strategies were not soundly based on efficiency and equity principles.

The analysis of regional issues in the draft plan was remarkably brief and disappointingly superficial. It did not provide a convincing basis for the principal thrusts of the draft plan.

The social value of land in alternative uses was not adequately considered and the efficiency principle of allocating land to its highest social value was neglected.

The relative costs of providing infrastructure for “greenfield” urban development and redevelopment or infill activities were not considered.

Because of land supply infrastructure cost issues, housing affordability is likely to become a more serious issue.

The document avoids directly addressing the problem of traffic congestion, which is a serious and worsening regional economic and social issue. This is puzzling and a serious deficiency of the draft regional plan.

Nevertheless, the draft regional plan contains some proposals that would be sensible in the context of the package of complementary measures proposed in section 8 above. Particularly important proposals are an orbital road system for Brisbane and, subject to some qualifications, establishment of transit oriented development sites with supporting “priority public transport networks and services”.

It is not clear if the Queensland Government is proposing a comprehensive system of outer, intermediate and inner ring-roads, as proposed by RACQ, or is simply proposing to complete an outer ring-road by providing a western by-pass. Also, it is unclear whether or not new segments of an orbital road system will be toll-free, as advocated by RACQ for good economic reasons, or subject to tolls like the Gateway and Logan Motorways.

Unfortunately, the draft plan signalled the Government's intention to continue to reallocate government funds from roads to public transport subsidies in South-East Queensland, even though economic analysis and overseas experience have shown that public transport subsidies are relatively ineffective and expensive anti-congestion devices.

Also, it appears that the Government intends to persist with a range of ineffective demand management strategies. Meanwhile, the Government continues avoiding the best available demand management tool, congestion charges, which also complement and enhance orbital roads, public transport, and planning measures, like TODs, as congestion-relievers, as well as providing revenue to fund transport infrastructure.

The draft regional plan is an improvement over the *status quo*. But, traffic congestion will inevitably worsen in South-East Queensland. Also, economic growth will be unnecessarily stunted because of worsening congestion and rising land prices.

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