

LOCAL GOVERNMENT
CHANGE COMMISSION

Electoral Arrangements Review

APRIL 2023

MORETON BAY
REGIONAL COUNCIL

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BACKGROUND

The Local Government Change Commission (Change Commission) is an independent body established under the *Local Government Act 2009* responsible for assessing whether a proposed 'local government change' is in the public interest. A local government change can include a change to the boundaries, divisions, number of councillors, name or classification of a local government area.

The Change Commission may only assess local government changes proposed by the Minister responsible for Local Government, with the exception of matters relating to the Brisbane City Council.

The Change Commission performs its functions independently and is administratively supported through the Electoral Commission of Queensland (ECQ).

MINISTERIAL REFERRAL

On 12 August 2022, the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning and the Minister Assisting the Premier on Olympic and Paralympic Games Infrastructure, the Honourable Steven Miles MP (the Minister), received a submission from the Moreton Bay Regional Council requesting a local government change of classification to city council.

On 16 September 2022, the Minister referred the conduct of an independent assessment and determination of a change of classification to the Change Commission (**Appendix 1**). The Moreton Bay Regional Council submission was included with the Minister's referral letter.

The Change Commission advised the Minister and the Moreton Bay Regional Council that the review report and recommendations would be finalised in April 2023.

The Change Commission for this review was constituted by Pat Vidgen PSM, Electoral Commissioner; Wade Lewis GAICD, Casual Commissioner; and Jennifer Lang, Casual Commissioner.

LOCAL GOVERNMENT PROFILE

The Moreton Bay Regional Council is located in South East Queensland and was established in 2008 after the amalgamation of the Caboolture Shire, the Pine Rivers Shire and the City of Redcliffe. It is the third largest local government area in Australia and is divided into 12 divisions with each division represented by one councillor.

The estimated resident population of the Moreton Bay Regional Council in 2021 was 490,606 with a land area of 2041.5 km² and a population density of 240.3 persons per km². As at March 2023, there were 336,392 electors enrolled to vote in the Moreton Bay Regional Council area.¹

A map of the Moreton Bay Regional Council is at **Appendix 2**.

SCOPE OF REVIEW

The Change Commission's review process included:

- considering the detailed submission from the Moreton Bay Regional Council outlining its arguments for the proposed classification change
- conducting community consultation through a call for written submissions
- assessing the legislative criteria for changing a local government classification set out in section 13 of the Local Government Regulation 2012, and
- analysing other information relevant to the review, such as financial grant information and comparative data on other cities in Queensland.

REGULATORY FRAMEWORK

A proposed local government change referred by the Minister must be assessed by the Change Commission to determine whether it is in the public interest², in accordance with requirements of the *Local Government Act 2009*.

The Change Commission, in assessing a proposed change, must also consider:

- whether the proposed change is consistent with the *Local Government Act 2009*
- the views of the Minister, and
- any other matters prescribed under a regulation³.

In discharging its responsibilities under the *Local Government Act 2009*, the Change Commission must perform its functions in accordance with the 'local government principles' which include using transparent and effective processes.⁴

Additionally, the Change Commission considered requirements of section 58 and section 13 of the *Human Rights Act 2019* in conducting the review and concluded that its recommendation is compatible with human rights.

¹ <https://www.abs.gov.au/statistics/people/population/regional-population>

² *Local Government Act 2009*, s.19(1)

³ *Local Government Act 2009*, s.19(2)(c)

⁴ *Local Government Act 2009*, s.4

ASSESSMENT

In undertaking the review, the Change Commission considered whether the proposed change is in the public interest as required by section 19(1) of the *Local Government Act 2009*. In making this assessment the Change Commission considered relevant legislation including the objectives and local government principles contained in the *Local Government Act 2009* as well as section 13(2) of the Local Government Regulation 2012 which contains the criteria for a local government area to be declared a city.

In assessing whether a proposed change is in the public interest, the Change Commission must also consider the views of the Minister about the proposed change, in accordance with section 19(2)(a) of the *Local Government Act 2009*. As the Minister did not provide any views on the proposed change in the review referral, this did not need to form part of the assessment.

Under section 19(3) of the *Local Government Act 2009*, the Change Commission may conduct its assessment in any way it considers appropriate. The Change Commission reviewed the submission provided by the Moreton Bay Regional Council in support of the proposed change including the outcomes of consultation conducted by the council. To ensure the issues and arguments raised by the council were considered in a balanced manner, the Change Commission also sought submissions from the community.

The Change Commission considered additional information from other sources to supplement, confirm or refute information provided during consultation. This included statistical data on other cities in Queensland and information about the process for the distribution of Federal and State grants to local governments.

Communities of interest considerations are relevant to the assessment of changes to local government boundaries under the Local Government Regulation 2012. However, as the proposal is for a classification change only and does not impact the current boundaries or communities which may be located within the broader external Moreton Bay local government area, these factors were not considered relevant for the assessment of this change proposal.

LEGISLATIVE CRITERIA

Section 19 of the *Local Government Act 2009* details the assessment process for a local government change, and section 13(2) of the Local Government Regulation 2012 outlines the matters to be considered if a proposed local government change relates to a change of the classification of a local government area.

This section lists the criteria for a local government area to be declared a city⁵:

- a) the area is the centre of a region providing commercial, industrial, health and public sector services for the region; and
- b) the area has, for the three years immediately before the declaration, had –
 - (i) a population of at least 25,000; and
 - (ii) a population of at least 15,000 in its urban centre; and
 - (iii) a population density of at least 150 people for each square kilometre of its urban centre.

⁵ Local Government Regulation 2012, s.13(2)

Services and urban centres

The region includes four urban centres in Caboolture, Redcliffe, Strathpine and North Lakes. Each of these centres includes commercial and industrial areas, hospitals and other public health facilities, transport nodes, sport and recreation venues, parks, museums and galleries.

In its submission the Moreton Bay Regional Council argued that it was comprised of a polycentric model rather than the common monocentric urban form representative of most cities. However, the *Local Government Act 2009* only refers to “urban centres” and makes no distinction between different urban forms. The Change Commission obtained legal advice and is satisfied that the polycentric character of Moreton Bay Regional Council meets the criteria in section 13(2) of the Regulation.

On the basis of this assessment, the Change Commission confirmed that the local government area meets the first criterion in section 13(2)(a) of the Local Government Regulation 2012.

Population and density

The second criterion in the Local Government Regulation 2012 relates to the population and density of the Moreton Bay Regional Council and the four identified urban centres.

The table below lists the estimated resident populations (ERP) and density level of each of the four identified urban centres for the last three years where data is available. As detailed below, for the last three years where data is available, the Moreton Bay Regional Council has had a population exceeding 25,000, and each of the urban centres have individually had a population exceeding 15,000 and a density exceeding 150 people per square kilometre.

Urban centre	ERP 2019	ERP 2020	ERP 2021 ⁶	Area (sq.km)	Population density 2019	Population density 2021
Caboolture	76,511	79,015	81,224	314	243.7	258.7
Redcliffe	62,954	63,941	64,680	213	295.5	303.7
North Lakes	85,014	87,829	89,832	66	1288.1	1361.1
Strathpine	39,789	40,217	40,445	38	1047.1	1064.3
Moreton Bay	473,885	485,535	490,606	2041.5	232.1	240.3

As the information above demonstrates, the Moreton Bay Regional Council meets all the population-based criteria set out in section 13(2)(b) of the Local Government Regulation 2012.

While all legislative criteria in section 13 of the Local Government Regulation 2012 have been met to declare Moreton Bay Regional Council as a city, the Change Commission has also considered additional information to ensure the change is in the public interest.

⁶ Australian Bureau of Statistics: Regional Population Estimates 2001 to 2022 (3218.0), March 2022

Issues for consideration

The Change Commission has considered the legislative requirements contained in section 13 of the Local Government Regulation 2012 for the classification of a local government area as a 'city' and determined that these requirements have been met by the Moreton Bay Regional Council, and individually by each major urban centre within the council area.

The constitution of the local government through a polycentric, versus monocentric, urban form is not inconsistent with the *Local Government Act 2009* and therefore would not preclude the Moreton Bay Regional Council from meeting the legislative requirements for classification as a city.

CONSULTATION AND OUTCOMES

The council provided its submission to the Minister on 12 August 2022 outlining its reasons for the proposed change and the consultation it had undertaken. This submission was provided to the Change Commission as part of the referral from the Minister. A copy of the submission is at **Appendix 3**.

To assist and inform its assessment, the Change Commission also conducted consultation with the public, as allowed by section 19(3) of the *Local Government Act 2009*.

Written submissions from the community were requested from 14 to 28 November 2022. The council's submission was published prior to the commencement of public consultation.

Submissions could be made by any person, by post, email or online form. This allowed any interested party, including residents and stakeholders, to provide their views for the Change Commission's consideration.

All submissions were published on the ECQ website following the conclusion of the consultation period where appropriate, in accordance with publication guidelines for the review (**Appendix 4**).

A copy of the publication guidelines are at **Appendix 5**.

Council submission

The Moreton Bay Regional Council submission, the *Local Government Reclassification Report*, which was included with the referral from the Minister, detailed reasons for changing the classification from a regional council to a city council. The arguments supporting the change in classification included:

- the Moreton Bay local government area "satisfies the criteria to become a city as outlined in the Local Government Regulation 2012"⁷
- there are four major urban centres in the Moreton Bay region – Caboolture, Redcliffe, Strathpine and North Lakes⁸, and
- as the third largest local government area in Australia, Moreton Bay is larger in population than three of the five councils that have city classification in South East Queensland.⁹

The information provided by the Moreton Bay Regional Council in its submission aimed to demonstrate that the local government area meets the legislative criteria listed under section 13(2) of the Local Government Regulation 2012. The council also provided information to support the

⁷ Moreton Bay Regional Council Local Government Classification Report, p35

⁸ Moreton Bay Regional Council Local Government Classification Report, p14

⁹ Moreton Bay Regional Council Local Government Classification Report, p3

proposed change, based on economic and social benefits to the community and the outcomes of its community engagement process.

Community engagement

The council conducted consultation with residents through a range of different formats and phases, to inform its submission supporting the proposed change.

Full details of the community engagement strategy are detailed in *Reimagining Our Moreton Bay: Engagement Summary July 2022*, included as an appendix to the council's submission.¹⁰

The council's consultation process took place from February to May 2022 and was spread across four phases:

- focus groups (phase 1) – 12 targeted focus group discussions were held with 64 participants to understand community sentiment toward becoming a city
- immersion sessions (phase 2) – 'one-on-one in-depth explorations' were held with 18 participants recruited via a market research panel
- *Your Say Moreton Bay* survey (phase 3) – the survey was published on the council's *Your Say Moreton Bay* platform and included 26 profiling questions and five reclassification questions that were completed by 451 participants, and
- community and business leaders poll (phase 4) – a luncheon was held with 150 invited guests to consider the potential economic benefits of a classification change with attendees nominated by each councillor.

A range of communication channels were used by the council to promote the consultation process, including web page updates, discussion papers, printed material (banners and posters) and television, radio and social media.

The key finding from the consultation process was that the proposed classification change was not an overwhelmingly important issue for members of the community. However, participants who supported the change identified that the potential for more funding and investment in the region had strong appeal. Although clear support was evident there were also strong concerns about the proposed change. Some respondents expressed concerns about the impact on rates and the possible cost of reclassification. The council stated in its submission that "concerns outlined would be addressed based on the feedback received to ensure accountability and transparency".¹¹

The council reported that 55 per cent of survey participants supported or were neutral to the classification change and 45 per cent were opposed.

Social and economic impacts

The council engaged an external consultant, KPMG, to assess "whether the possible short and long-term strategic social and economic outcomes are achievable from reclassification".¹²

The 'immediate impact of becoming a city was linked to four key areas':

- increased cohesion, social inclusion and civic pride
- increased awareness and improved perception of Moreton Bay
- shared economic interest, and
- increased equity within Queensland and nationally.

¹⁰ Moreton Bay Regional Council Local Government Reclassification Report, Appendix 11

¹¹ Moreton Bay Regional Council Local Government Reclassification Report, p32

¹² Moreton Bay Regional Council Local Government Reclassification Report, p24

The KPMG report also noted that city status can be a catalyst to accelerate planning processes and enable economic growth and improve social outcomes. If the proposed change is approved work will commence on the development of a new identity for the region to unite Moreton Bay's diverse communities.

Costs

The Change Commission was mindful that the cost of implementation is a legitimate public interest consideration in assessing the proposed change.

The council submission advised that costs associated with the change of the council's corporate identity have not yet been estimated or quoted and that it has an existing operational budget of \$400,000 per annum for maintenance and replacement of signage, which could be used to cover any costs necessitated by a change to classification. The council also advised that it did not expect the costs to be immediate or significant.

The council also stated that, if a reclassification is recommended, it would request the works for replacement of brand, logo, signage and other materials to be scoped. However, it intends to continue to apply the policy position since amalgamation that signage would only be replaced as necessary.¹³

Polycentric versus monocentric urban forms

The Moreton Bay Regional Council engaged Archipelago, an architecture and urban design consultancy firm, to 'spatially review how Moreton Bay's existing urban form could be enhanced to support city status'.¹⁴

The Archipelago report, *Moreton Bay City*¹⁵, focusses on a 'vision for the City of our Dreams'. The report also discusses the concept of a polycentric urban form in which the region is made of 'complementary highly connected centres with diverse urban forms'.¹⁶

Comparisons are made between the current monocentric view of one city centre, which brings with it 'social and environmental costs'¹⁷, and polycentric cities comprised of complementary and highly connected centres. Multiple major centres exist throughout the region – Redcliffe, Caboolture, Strathpine and North Lakes – which supports the polycentric model.

Change Commission request for written submissions

The Change Commission received a total of 103 written submissions during the two-week submission period for the assessment. The majority of submissions (83) did not support a change to the classification, while 17 submissions supported a change, and three submissions did not express a definitive position.

The opposing submissions focussed on disagreement with the council's polycentric hubs proposal, the different geographical characteristics of the region, the perceived lack of community consultation, and concerns about costs and potential rate increases.

¹³ Moreton Bay Regional Council Local Government Reclassification Report, p25

¹⁴ Moreton Bay Regional Council Local Government Reclassification Report, p22

¹⁵ Moreton Bay Regional Council Local Government Reclassification Report, Appendix 3: Moreton Bay City

¹⁶ Moreton Bay Regional Council Local Government Reclassification Report, Appendix 3, p30

¹⁷ Moreton Bay Regional Council Local Government Reclassification Report, Appendix 3, p28

The predominant views of submissions that opposed a change to the classification include:

- “The Council has not provided a single argument, which is backed up by verifiable facts. All of the promised benefits can be achieved with us remaining a Region. Council's consultation process was a shambles and an invalid process.” (S1)
- “We are a broad expanse made up of towns, areas and cities therefore a 'region' rather than a 'city' is more appropriate.” (S6)
- “Moreton Bay Region is not a city. The outer areas don't look like a city, don't get treated like a city and the people who live there moved to get away from the city.” (S14)
- “The amalgamation of the three councils into one, to become Moreton Bay regional Council, has left such a division in the communities, that to change an already established all be it divisive community into a city will only cause more of a division.” (S47)
- “I don't believe there has been enough consultation with the people. I worry about the cost to us rate payers, also will we get more funding from the government when we become a city? Where will the CBD be? What will be our new title? Will our rates go up? what about the traffic in regard to being a city?” (S56)
- “There is absolutely no good reason to change the status of our region...it is a diverse geographical and cultural place with many towns and suburbs. For our current elected council to dismiss the wants and needs of the people they purport to represent, is a gross overstepping of their mandated powers.” (S57)
- “The Moreton Bay Regional Council area is made up of a wide variety of suburbs such as many smaller country townships, beachside communities and some small outer city suburbs making this such a wonderful place to live. This diversity is the very reason so many people want to call this place their home.” (S70)
- “Think of the cost of changing signs, government papers, any papers with Moreton Bay Region on it. Why not put the money from this to upgrading roads, schools, hospital, aged care homes.” (S74)
- “Moreton Bay Region is already on the map. We don't need to appear in the online searches of the 'top 50 cities'.” (S90)
- “We are not a city; we are a region. Focus on providing the services we ratepayers are paying dearly for like infrastructure.” (S97)

The majority of submissions supporting the proposal were from local businesses and organisations and provided the following comments:

- “As Australia's third largest local government area, and one of the fastest growing regions nationally, Moreton Bay has a great opportunity to take its place as one of the South-East Queensland's pre-eminent cities.” (S2)
- “As a resident, business owner innovating and manufacturing award winning clean energy powered products exported globally, I believe the move from a region to city would be highly beneficial” and would “drive further investment into the region required for capital infrastructure”. (S3)
- The “city classification will help potential investors from outside the region”, it would be “more representative of our size”, and “it aligns with our region's aspirational attitude to be an innovative, smart city of choice”. (S18)
- This “is the third largest council in Australia and growing rapidly. We need a name, we are not a country regional city...we need to unite a wonderful diverse city”. (S27)

- “Before the amalgamation, Redcliffe was considered a city. So it makes sense that a region that has quadrupled in size be a city in its own right to give us greater access to funding.” (S40)
- The Redcliffe Peninsula Chamber of Commerce “fully supports the ambitions of the Moreton Bay Regional Council to become a city and believe this has been long overdue and deserved progression that will drive investment, jobs and economic growth.” (S53)
- The Greater Caboolture Chamber of Commerce considers the name change to be “important for the long-term prosperity of businesses within the region”. (S95)
- Regional Development Australia Moreton Bay supports the proposal to change the classification as “City status and associated greater recognition of the region will expedite collective investment from the private sector and government”. (S102)

It should be noted that the term ‘region’ in the Local Government Regulation 2012 has a different definition to the usage of the term implied by the written submissions. Section 13(5) of the Regulation defines a region as a local government formed by the amalgamation of two or more local governments of any class. The submissions appear to suggest the term ‘region’ implies geographical criteria such as more sparsely populated rural areas and towns.

Issues for consideration

The Change Commission noted that very few submissions were received in comparison to the population of the region and that it was difficult to generalise these responses as reflecting the views of most ratepayers.

Based on the submissions the Change Commission received, there are concerns within the community that the proposed change would lead to a changed strategic focus of the council and that the large rural areas and smaller townships within the Moreton Bay region would be adversely impacted in resourcing and funding decisions and representation of the views of those communities.

The submissions in favour of the proposal were predominantly from the local business community who supported the Moreton Bay Regional Council view that a change of classification to a city would increase recognition and provide economic benefits. These views, expressed by the council and submissions in favour of the proposed change argue that it provides an opportunity to better promote the local government area.

COMPARATIVE ANALYSIS

The Change Commission considered the arguments advanced by the council regarding the classification and examined several data sources to review the context in which the Moreton Bay Regional Council operates compared to other local governments in Queensland.

Queensland cities

Although the Moreton Bay Regional Council does not have a single central business district like Brisbane City, the 2008 amalgamation incorporated four existing urban centres — Caboolture, Strathpine, Redcliffe, and North Lakes.

There are currently seven out of 77 local government areas in Queensland that are classified as cities. The following table compares each of those cities: ¹⁸

COUNCIL	Population 2021	Projected population 2041	Area (km ²)	Density 2021	Dwellings	Budget 2022-23
Brisbane City Council	1,264,024	1,551,149	1,326	953	519,427	\$3.3 billion
Gold Coast City Council	633,764	943,686	1,334	475	270,760	\$1.7 billion
Ipswich City Council	350,740	557,649	1,096	320	87,352	\$621 million
Logan City Council	350,740	554,327	959	366	125,974	\$1.014 billion
Mount Isa City Council	19,226	18,677	43,841	0.44	9,045	\$70.8 million
Redland City Council	161,730	192,431	537	301	65,213	\$396 million
Townsville City Council	222,284	282,291	3,731	60	75,241	\$957.5 million
Moreton Bay Regional Council	484,428	690,602	2,042	237	188,326	\$816 million

The seven city councils in Queensland vary widely in relation to population, land area, number of dwellings and annual budgets:

- estimated resident population ranges from over 1.2 million people (Brisbane) to 19,226 people (Mount Isa)
- land areas range from 43,841 km² (Mount Isa) to 537 km² (Redland)
- number of dwellings (private and commercial) range from 9,045 (Mount Isa) to over 500,000 (Brisbane), and
- annual council budgets range from \$3.3 billion (Brisbane) to \$70 million (Mount Isa).

Based on the same data categories, Moreton Bay Regional Council is comparable to other local government areas currently categorised as cities.

Funding

The Moreton Bay Regional Council submission noted that “with greater status it will make it easier to advocate to the State and Federal Governments for investment” and will “ensure the [local government area] reaps the benefits...through funding at all levels of government”.¹⁹

The council also included with its submission a KPMG report, “Moreton Bay City Classification Economic and Social Benefits”. This report stated that reclassification as a city “elevates the status of a location” for State and Federal governments in considering funding priorities.²⁰

¹⁸ Australian Bureau of Statistics, Census of Population and Housing 2021 and Regional Population Growth, Australia (3218.0); Budget Papers published by individual city councils; Queensland Audit Office

¹⁹ Moreton Bay Regional Council Local Government Reclassification Report, p4

²⁰ Moreton Bay Regional Council Local Government Reclassification Report, Appendix 4, p10

The Change Commission considered the process of allocation of funding to local governments by the Federal and State governments to determine whether this was a legitimate consideration in assessing the proposed change.

Federal and State grants

The Australian Government provides annual financial assistance grants to local governments, which are split between general purpose and local road allocations.

In 2022-23, Queensland was provided \$575.54 million, and the Moreton Bay Regional Council received \$17.78 million from this allocation. The funds are allocated to individual Queensland local government areas through the Queensland Local Government Grants Commission (QLGGC).

The QLGGC is an independent statutory authority whose primary role is to make recommendations about the allocation of the financial assistance grants to Queensland Councils. Allocations are based on population numbers and the financial capacity of each council, and not on their classification.

Other grants and subsidies

The following funding programs are also currently available through the Queensland Government grants model: ²¹

- Local Government Grants and Subsidies Program 2022-2024
- Works for Queensland Program 2021-2024
- South East Queensland Community Stimulus Program 2021-2024
- State Government Financial Aid 2022-2023, and
- Local Government Levy Ready Grant Program 2022-2024.

Allocations for these programs are made to support Queensland Government priorities and objectives and respond to local government strategies and needs, and not on their classifications.

Issues for consideration

The analysis of established Queensland city councils indicates there are no uniform characteristics. Based on this analysis, the Moreton Bay Regional Council is comparable to existing cities and would not be considered inconsistent if the proposed change were to be implemented.

Although the Moreton Bay Regional Council stated that a change to classification would attract additional State and Federal funding, the Change Commission did not find specific evidence that this would be a relevant factor in such decision-making as grants are generally based on population or specific project and infrastructure requirements.

²¹ [Grants to Local Government Model](#)

CONCLUSIONS

The Change Commission has assessed various considerations associated with the electoral arrangements for the Moreton Bay Regional Council and recommends a change in classification from 'region' to 'city' as being in the public interest.

In reaching its recommendation, the Change Commission gave consideration to all views and materials presented to it, including the legislative requirements for classification as a city, community views on the proposed change and the local government principles of the *Local Government Act 2009*.

The Change Commission considered the Moreton Bay Regional Council meets the legislative criteria required to change classification to a city set out in section 13(2) of the Local Government Regulation 2012.

The Change Commission also considered the council's submission for change, and in particular the council's stated benefits to the community and the region as a whole, including:

- increased regional investment
- enhancement of planned economic initiatives, and
- fairer social outcomes for residents.

In considering the council's stated benefits the Change Commission also considered the community feedback received by the council on its proposal. The Change Commission noted the key area of support for the proposed change through the council's engagement process was from the business community, and that community input to this process was limited compared to the overall population.

The Change Commission also considered the submissions it received on the proposed changes. While this feedback was generally opposed to the change, the small number of submissions received means it was difficult to consider this feedback as representative of the broader population.

Reasons for opposing the change included a belief that there was a lack of consultation, that the term 'region' reflected the geographical characteristics of the local government area and concerns about the possible costs of implementation of the change.

The Change Commission is aware that the Moreton Bay Regional Council has not explicitly outlined the actual costs of full implementation of the proposed change. However, the council's submission outlines a proposed policy of phased implementation from within existing allocations, including a commitment to ensuring the costs of implementing the proposed change are managed appropriately. Accordingly, this consideration is not of sufficient weight to balance the decision against the public interest.

The Change Commission notes that the system of local government in Queensland requires that councils be elected and make decisions in the best interests of their broader community in accordance with the local government principles under section 4 of the *Local Government Act 2009*.

Notwithstanding the opposing feedback received, the Change Commission considers the social and economic benefits the Moreton Bay Regional Council has outlined for the region and the community, together with the fact that the proposed change is consistent with legislative provisions, means that on balance the proposal to change the council's status to 'city' is in the public interest.

RECOMMENDATION

The Change Commission recommends that there be a change to the classification of the Moreton Bay Regional Council to the Moreton Bay City Council.

The Change Commission has provided the report of its assessment to the Minister. In accordance with the *Local Government Act 2009*, the Change Commission has published the report on the ECQ website and a notice will be placed in the Queensland Government Gazette.



Pat Vidgen PSM
Electoral Commissioner



Wade Lewis GAICD
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Jennifer Lang
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APPENDICES

- APPENDIX 1** Ministerial referral
- APPENDIX 2** Moreton Bay Regional Council map
- APPENDIX 3** Moreton Bay Regional Council submission
- APPENDIX 4** Public submissions
- APPENDIX 5** Publication guidelines

LOCAL GOVERNMENT CHANGE COMMISSION

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