

13 March 2014

The Hon Jeff Seeney MLA  
Deputy Premier and Minister for State Development, Infrastructure and Planning  
Yeerongpilly TOD Consultation  
Department of State Development, Infrastructure and Planning  
Reply Paid 15009  
CITY EAST QLD 4002

Dear Deputy Premier

I am writing to object to the State Government's proposed Detailed Plan of Development (Masterplan) and State Planning Regulatory Provision 2014 (SPRP).

There is a reason that in the almost 200 years of civilisation and development in Brisbane that the Yeerongpilly TOD has not be built on. It floods and floods badly.

I am disappointed that the State Government has not learnt the lessons of the January 2011 floods and has increased the density proposed for the site and reduced the amount of green space compared with the 2010 Masterplan.

The State Government and Council botched the Tennyson Reach approval in 2007 and it seems as though the Government is desperate to approve these developments despite the significant capacity constraints such as flooding, access and traffic congestion.

Further the proposed Masterplan does not guarantee any improvements for the existing community and does not provide any certainty that the site will be developed in an organised way. The staged development of the existing Tennyson Reach development, as originally planned, failed due to a range of factors including finance and natural disaster. The community, via Brisbane City Council, then bailed out the developer Mirvac by purchasing a small 1.7 hectare parcel of land, originally intended for residential development, for a park and playground at a cost of \$15 million.

Given the potential for future flooding or financial problems, it is likely that this scenario could again develop in the future, leaving the community with another incomplete development that requires another public sector bail out.

This land is currently owned by Queensland taxpayers and should be retained in public ownership. There may be some uses that could offer a substantial return, both economic and/or social for the State Government that should be considered rather than the proposed Masterplan which has already failed once on this site. Further suggestions about possible alternate uses are made later in this submission.

Please note, while I have commented on specific parts of the proposed Masterplan and SPRP as below, this should not be read as an endorsement of other sections that I have not specifically commented on. I do not support the Masterplan and SPRP as proposed. I believe it should be scrapped and the State Government rethink the best use of this site given its flooding and capacity constraints.

### Flooding

There have been 11 major floods recorded on this site over the past 170 years the most recent in January 2011. The vast majority of the site flooded, as pictured below, not as stated by Mr James Coutts at the public meeting at Yeronga in February 10% of the site. He was publicly laughed at and jeered and rightly so for making such a demonstrably untrue statement.

The picture below clearly demonstrates the extent of flooding on the site. Only a very small part of the site did not flood. This area is bounded by the heritage buildings, Fairfield Road and the Tennyson Spur Line.



The January 2011 flood was significantly lower than the 1974 flood. While each flood is different on more than 11 occasions over the past century plus this site has flooded. This area is a geographic low point on the Southside and will flood again in the future.

In 2007 the Tennyson Reach residents were reassured by the State Government, Brisbane City Council and Mirvac that the Tennyson Reach site would not flood. It did. The Q100 was not an adequate flood level based on flawed modelling and an overreliance on the benefits of Wivenhoe Dam when the Tennyson Reach complex was built. Similarly, reliance on the Brisbane City Council Defined Flood Level, which is based on the actual flood level in 2011 will prove to be inadequate in the event of another catastrophic flood incident.

The January 2011 flood level was one metre lower than the 1974 flood level at the City Gauge and 3.8ms lower than the 1893 floods. In all there have been six major floods higher than the January 2011 flood since 1841.

I have seen first-hand the despair and destruction caused to people's lives by flooding. They lose their homes, possessions and hope. Insurance and grants are never enough

to fully rebuild or recover and residents live with the ever present risk that a major flood will happen again.

The State Government has an ethical obligation to ensure all possible risk management is considered for the site and a conservative or precautionary approach to the future development is undertaken, given its significant flooding history.

I do not support residential development anywhere on this site due to the extremely high risk of flooding and the damage it is likely to cause to any new residents. In addition the significant changes to the sites detention capacity are likely to lead to adverse impacts for surrounding residents in Tennyson and Yeronga as water that could previous flow across the site is displaced elsewhere.

Fill and extraction on the site is not supported. I have been advised by the Coordinator General's office that 125,000cbm of fill is proposed for the site. This is only to meet the proposed road works, not all future development.

The proposed amount of fill to raise the individual development sites and then create habitable floor levels is extraordinary and unknown. It has not been addressed at all in the Masterplan and is unquantified. As such the ultimate hydrology impacts on flood storage capacity are unknown, but will further reduce the amount of flood storage capacity on the site already identified by the State Government in the Masterplan.

It is reckless for the State Government to proceed without a clear indication of the total amount of future fill and excavation on the entire site and detailed hydrology reports about flooding impacts.

Fill will act as a barrier or levee and will alter the current overland flow paths, accelerate and in some access retard water flows and result in a significant loss of flood storage capacity in the district.

The Queensland Flood Commission of Inquiry Report dated March 2012 makes it very clear that:

- any planning schemes (ie development) **should not** reduce on-site flood storage capacity;
- **should not** undertake any works or plan that change flood characteristics such as loss of flood storage, changes or loss of flow paths, acceleration/retardation of flows and any reduction in flood warning times;
- should include counteraction works to address any flooding impacts.

Recommendations 7.16 and 7.17.

At paragraph 5.7 Infrastructure under the Earthworks sub-heading the State Government's Masterplan makes the following statement:

**“It is expected that the overall flood storage for the Yeerongpilly TOD will be less than the current situation”.**

The current proposal states in plain English that it will increase local flooding impacts and fails to meet the Royal Commission recommendations. As such, the proposal should not proceed until all recommendations of the Royal Commission are fully meet or exceeded.

I do not want to see more people go through the trauma of what happened in January 2011. What little profit the State Government may make on the sale of this site will surely be offset in future with the hundreds of millions of dollars required to repair public assets, support private household recovery, assist community groups and businesses in the event of a future flood.

### Density

The 2014 Masterplan actually increases the level of density on the site beyond what was proposed in the 2010 Masterplan. The current proposal includes provision for 1,700 additional dwellings and between 2800 – 3000 people. This is a gross overdevelopment of the site and is not supported.

Significant sections of the Masterplan allocated for residential development flooded badly in January 2011. Instead of reducing the residential development to areas of the site that did not flood, the State Government is proposing to increase the high density development on the site in the waterway corridor in an area of significant flooding.

The 2014 Masterplan reduces the amount of green space from that proposed in 2010 which is a poor outcome for the site.

I do not support further residential development on this site due to the serious flooding impacts.

The Master planning documents also present a false picture of the currently designated low density site facing Ortive Street bounded by Fairfield Road. This site has already been given/sold to Montrose Access for a residential care facility which has since been approved by Brisbane City Council. As such the State Government has already deviated from its proposed Masterplan.

### Traffic

The Traffic Report clearly states that it has used out dated figures to model the traffic impacts. The figures used relate to the development of the Tennyson Reach complex and are about 8 years old. As such the traffic report is useless and fails to recognise or accurately calculate the current traffic impacts and likely traffic impacts from the proposed Masterplan.

The Report includes a fundamental assumption that the Traffic Report will support the development rather than looking at the precinct and traffic implications independently. This is a seriously flawed approach that clearly identifies shortcoming that the State Government is treating the Masterplan in isolation from the surrounding community.

The Traffic Report fails to consider the flow on traffic impacts for the older section of King Arthur Terrace, Graceville Ave, Venner Road or Oxley Road at all. The Traffic Report fails to even refer to these roads despite their immediate proximity to the proposed development. This demonstrates that little thought has been given to the impact of the massive redevelopment on the surrounding neighbourhoods, homes and roads, many of which are already operating at over capacity. This is a major oversight in the Master planning and SPRP process.

The proposed fill, raising the King Arthur Terrace Extension and straightening the road is not supported. Dual carriageway will simply encourage drivers to increase speed in the precinct and or support higher volumes of traffic. It is not be a form of "traffic

calming” as stated by your Government’s representative for this project, James Coutts, at the community meeting in Yeronga in February.

I do not support Brisbane City Council and the State Government’s attempts to increase the classification of this road to a District Access Route. This was done without notice to local residents who live on the street. I did not support the draft City Plan and do not support the redesign of the roads and the significant traffic safety impacts that will follow.

Road widths may be too narrow for on street parking and useable carriage way leading to internal conflicts within the site and/or a lack of available on street parking in the precinct. This is clearly evident in the diagrammes in the Masterplan for a Neighbourhood Street. The 7.5m carriageway is not sufficient to enable cars to pass when vehicles are parked on both sides of the road as intended and shown. This will lead to internal conflicts and congestion when up to 3000 people, as forecast by the State Government, need to drive on their “neighbourhood street”. As it is currently doing, this will also cause further adverse impacts for surrounding streets such as Ortive and Paragon that are already being parked out by visitors to Tennis Centre and Council Office.

The plan fails to include any dedicated on or off road cycling facilities. This area is already a highly trafficked cycling area and the lack of cycling facilities has not been accommodated on the site (road widths are extremely narrow and do not provide a cycling shoulder) or to establish better connections to and from the site. The statement that “connections to the surrounding communities will be improved an enhanced over time” is unsupported by any evidence. The State has provided no cycling infrastructure or plans for the site and nearby suburbs and Brisbane City Council’s Long-term Infrastructure Plan and Priority Infrastructure Plan does not provide for any cycling improvements in the area. This is a flat out misrepresentation or a hollow promise in the Masterplan that has not been substantiated in any way.

The realignment of Main Street with the existing Ortive and Mooney Street intersection in Yeronga is not support and will lead to major vehicle and safety incidents. This was a serious safety issue raised in the original 2010 consultation process.

Paragon Street residents should be directly surveyed regarding the proposed closure at Fairfield Road. Many residents will be unaware of the State Government’s plans to reduce access to their Street and provide access only via the King Arthur Terrace precinct.

The Report also contains a number of serious inaccuracies and flaws. For example reference to the Cross River Rail project which was cancelled by the State Government last year, and which the community has been told, was not relevant to the TOD Master planning process. It refers to the pedestrian overpass being “under construction” despite being opened in 2010 and Tennyson Reach buildings not being built, when three have been for many years.

These flaws, and many others, indicate to me that the Traffic Report is a rough ‘cut and paste’ of previous documents, with a tacked on report of recent AM and PM traffic numbers at the King Arthur Terrace/Fairfield Road intersection.

The State’s identification of pedestrian access at the Tennyson Memorial Avenue end of the site is laughable. For the past four years the State Government has consistently stated that it will not provide any other site access. Stating as the Government is doing that there may be a “possible future pedestrian connection” is a form of unreliable

weasel words. Putting thousands of existing residents and thousands more new residents into a precinct with limited egress points is extremely poor public policy. Clear decisions need to be made and communicated to the public about traffic plans and that has not occurred in the proposed Masterplan.

### Public Transport

There is one serious problem with the Yeerongpilly TOD, it is not a transport oriented development. There is limited public transport available and the State Government had planned last year to cut all bus services for the area.

The State Government and Brisbane City Council have undertaken several bus reviews recently and have consistently refused over the past six years to increase bus services. The State Government's hollow promise of a 30 minute bus service defies credibility.

Similarly, the State Government has confirmed that Cross River Rail project will not be proceeding and no station upgrades are planned for Yeerongpilly. Intercity rail services to the Yeerongpilly Rail Station were cut a few years ago.

Putting thousands of new residents into an area with an inadequate bus and rail services, without firm, reliable plans for additional public transport as is the purpose of a TOD makes a mockery of its purpose. If the site develops in a piecemeal way, as expected by the State Government, it may be that no new public transport services for the district are ever delivered.

As one of my constituents has said, the T in TOD is a mirage. The State Government is simply focussing on the D for development.

### Parking

Reductions in parking ratios for the residential developments on the site are not supported.

The proposed road layout seems inadequate for the density proposed and the width of carriageways and on street parking inadequate to service the proposed residential and commercial areas.

The existing site contains inadequate parking and drop off facilities for the Queensland Tennis Centre currently. No effort has been made in the proposed Masterplan to address these inadequacies. Instead the plan removes what informal parking existed on the Ortive Street frontage altogether without making any alternate arrangements. This will further exacerbate the already problematic traffic and parking problem in nearby Yeronga streets, which is already overflowing from the current small development of on the site.

This is seriously short-sighted and the future expansion of the Tennis Centre without adequate parking or drop off facilities on the site will continue to cause problems and congestion for the surrounding residential areas.

The current Master planning process was a timely opportunity to revisit arrangements that has been ignored.

## Green Space

The current site performs a vital waterway corridor and wetland function that will be completely disrupted by the proposed development layout.

Ken Fletcher Park is a very small park, about 2.5 hectares in total. It was built to service the Mirvac Tennyson Reach development and was never envisaged to cater for the entire site. Further parkland is needed to support the recreational needs of local residents, protect the waterway corridor and wetland function and provide adequate flood storage capacity.

It is completely inadequate public policy position to state, as the Masterplan proposal does, that because of previous bad conduct by the State Government and Brisbane City Council in destroying natural wetland and significant waterway corridors nearby it is ok to cause further future damage.

The findings and recommendations of the Flood Royal Commission should be fully implemented on the site and they have not been in this proposed Masterplan.

The provision for two very small patches of parkland as part of the TOD Masterplan is inadequate for a development of this size and predicted population growth. The majority of this site should be retained as green space, parkland or recreational space.

## Community Use

The Masterplan proposal fails to include any meaningful community facilities on the site, other than very small areas of green space.

This fails to reflect the very strong and clear views of the local community during the original consultation sessions in 2010.

The State Government's assertion that a Southside Performing Arts Centre at Runcorn in any way meets the need for additional community facilities in Tennyson a surrounding suburbs is absurd. It is geographically and socially remote from the TOD site and demonstrates a significant lack of understanding of the community's needs and views for the site.

A consistent part of the community feedback to the original Masterplan (2010) and through the QUT planning exercise has been the importance of including community use facilities on the site. I have attached a copy of the QUT recommendations.

This was an extensive community consultation process, led by well-respected planning expert, Dr Phil Heyward, and included representatives from the State Government, Coordinator Generals office, Council, the community, businesses and residents. Their recommendations address the importance of additional community facilities on the site to meet local needs.

It has always been envisaged that the site would include the reuse of the heritage buildings for community purposes. The State Government has now earmarked these buildings for commercial development. No local not-for-profit groups can afford to compete with commercial enterprises to secure land on the open market.

The State Government should dedicate a significant portion of the site to community use purposes which could include, for example a:

- community hall/centre
- PCYC
- visible Ink space run by Brisbane City Council
- markets, arts and craft spaces
- additional community sporting facilities like a multi-user basketball court.

Since 2010 I have strongly recommended that the State Government and Council develop a community centre as part of its *Visible Ink* programme on the TOD site. A centre of this type could be based on a PCYC model, providing opportunities for young people and the broader community to use a hall for indoor sport, functions, events, meetings, training, music, art and other activities.

A community centre of this type would benefit not only the many young people from refugee backgrounds who currently use outdoor facilities in Yeronga, but local groups looking for low cost space for community or social activities.

The State Government should revisit the extensive original community planning feedback which outlined very clearly the type of community facilities desired and incorporate a significant amount of community use space into the Masterplan and SPRP guidelines.

On a positive note, a community garden is a good idea, but the Masterplan doesn't appear to include any space provision for a future garden other than a small corridor between the high rise buildings. This small space does not include sheds, water tanks or other necessary facilities. Locating a garden between high rise buildings is a stupid idea as the lack of sun and excessive shade will not provide ideal growing conditions. This proposal has been badly designed within the Masterplan.

Suggesting a community garden as one of the only community benefits for the site is seriously deficient and the many ideas suggested by the community in 2010 should be revisited and prioritised.

### Vegetation

The State Government's proposal to remove 90% of the mature vegetation on the site is not supported. All native and significant species should be kept and retained on the site and integrated into the overall landscaping plan for the site.

### Stormwater/Sewerage

The area is currently serviced by inadequate stormwater and sewerage networks. Regular backflow flooding occurs in and around the site that would be exacerbated by significant residential and commercial development as proposed.

The proposals failure to build significant new residential and commercial/retail buildings without any improvements to the proposed stormwater and sewerage networks is grossly inadequate.

The proposal to use the existing Ortive Street and Tennis Centre sewerage infrastructure is not supported. The use of existing, in some cases aged infrastructure, will result in adverse impacts for surrounding residents.

The failure to provide any upgrades to existing stormwater or sewerage infrastructure given the size of the proposal is reckless and inadequate planning by the State Government.



The plan fails to provide any safeguards in light of the significant flooding impacts such as backflow valves to prevent recharge in the precinct. This is the first form of flooding experienced in the nearby Tennyson Reach complex, which caused substantial damage in the common areas including the garage.

The fact that it hasn't even been considered in the Masterplan, three years after the floods, clearly demonstrate the State Government is not interested in genuinely learning from the January 2011 flood impacts in the local area.

This is another lost opportunity between the 2010 and 2014 Masterplans.

### SPRP

The overall outcomes for the Yeerongpilly TOD at section 2.1 (3), proposed as a residential mixed use development, is not supported due to flooding impacts.

The purpose should be redefined to focus on greater parkland and recreational uses, including open space and community reuse of the heritage buildings. A small commercial/retail component on the non-flood prone land may also be appropriate to support the existing residential community.

The inclusion of medium and high density residential development is not supported in 2.3 Residential Mixed use precinct. The Masterplan clearly shows at page 26 and 27 that the these areas are located well within and below the January 2011 flood line. I do not support any new residential development on known flooding hotspots.

Even if the habitable floor level is built at the BCC Defined Flood Level, under this Masterplan and SPRP, common areas, carparks and services (and most likely units) will be subject to flooding should a flood of the 2011 height or greater occur.

3.1 Tables of Assessment. The proposed tables of assessment are not supported. Currently all listed uses are either Code or Self assessable, limiting the right of the community to review, comment or object on future development. For example, under the proposed tables of assessment a major Tennis Stadium or High Density development could be built without community consultation or feedback under the town planning process.

### Council – State Government Planning

The plan suggests that infrastructure and benefits for the local community will be delivered over time.

It is essential that the State Government and Council establish a clear list of who is responsible for what infrastructure so the blame game does not occur in a few years over who should be delivering on the proposed commitments.

This is a State Government project and as the profits from the sale of this site will flow to the State Government it is the State Government's responsibility to ensure that community infrastructure is delivered that benefits and improves the lives of local residents.

The vague nature of the promises in the Masterplan leave significant opportunity of the State Government to avoid delivering on it commitments and pass responsibility onto Brisbane City Council once the land has been sold. The likely piecemeal development

process over many may enable developers to avoid larger or holistic infrastructure needs under the Brisbane City Council town planning process.

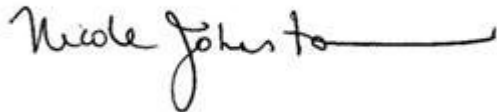
The State Government must deliver a clearly defined and agreed range of improvements and enhancements for the existing and proposed community. To do anything else would be unacceptable cost-shifting between the two levels of government.

As it is currently, the site has been left as derelict for the past three years and the State Government undertakes little maintenance. The State must take responsibility for proper maintenance and improvements to the site now and in the future.

The proposal put forward by the State Government for the Yeerongpilly TOD site will have catastrophic future impacts for existing and future residents and the natural environment. The Masterplan fails to take into account the extensive community feedback put forward in 2010 and fails adequately address the very real flooding impacts it the event of a natural disaster.

I urge the State Government to significantly revise this plan in light of the above submission.

Yours sincerely

A handwritten signature in black ink that reads "Nicole Johnston" followed by a long horizontal flourish.

**Nicole Johnston**  
**Councillor for Tennyson**