

Cr Nicole Johnston

Councillor for Tennyson Ward



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The Hon Jackie Trad MLA
Deputy Premier and Minister for Transport, Infrastructure and Planning
Yeerongpilly TOD SPRP 2016 Consultation
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Dear Deputy Premier

I am writing to make a submission to the draft Yeerongpilly Transit Oriented Development (TOD) Detailed Plan of Design and State Planning Regulatory Provision 2016 (SPRP) dated December 2016.

I draw your attention to my previous submission on the 2010 Detailed Plan of Design and State Planning Regulatory Provision. All of my concerns about over development, flooding, traffic and amenity raised at that time, remain the same.

My concerns however, have been exacerbated by the changes proposed in the revised masterplan and SPRP. I strongly object to the current draft masterplan and SPRP on the following basis:

- the plans are a gross overdevelopment of the site;
- flooding will be increased on and around the site posing an unacceptable risk to existing and future residents;
- traffic planning to cope with increased demand on roads to and from the site and the provision of public parking onsite is grossly inadequate;
- the lack of community use facilities proposed for the site;
- the reduction in size of public parklands;
- the demolition and relocation of significant historic buildings;
- inadequate technical reports to plan for the proposed development and traffic, hydrology; and
- suspension of the Brisbane City Council planning scheme and lack of statutory public notification about future development.

The plans, the size of a new suburb are excessive and extremely little attention has been given into how this 14 hectare site will impact and integrate on the existing community and infrastructure. It's like it was designed in a vacuum and plonked down to fit the space. Sadly, the December 2016 plans move even further away from the original draft masterplan from 2010, and the revised 2014, which at that time did little to reflect the extensive community feedback provided in 2010 and 2011.

Please do not let profit override the need for good planning and infrastructure that serves future generations of southsiders well. I urge you to rethink the scope and scale of the proposed masterplan, ensure that essential infrastructure including roads, bus and rail services, stormwater and sewerage services are all upgraded.

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.

Flooding

There have been 11 major floods recorded on this site over the past 170 years the most recent in January 2011, pictured.

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 previously 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 full extent of possible flooding on the site has not been modelled in the existing hydrology reports because the extent of fill for individual development sites is unknown. To proceed without knowing the full extent of flooding is unreasonable and negligent.

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.

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, based solely on road works not the fully developed site. As such, the proposal should not proceed until all recommendations of the Royal Commission are fully met.

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 increased the level of density on the site beyond what was proposed in the 2010 Masterplan. The current 2016 proposal includes provision for 1,200 – 1,500 additional dwellings and up to 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.

I object to the proposal to:

- increase high rise density on the site on the south-western side of King Arthur Terrace;
- expand the footprint of the low to medium density area between King Arthur Terrace and Ortive Streets;
- building heights of up to 12 storeys on the site.

The suburb of Yeerongpilly will go from being one of the smallest in Brisbane at 800 dwellings to one of the larger suburbs with around 2,200 dwellings, with little if any new infrastructure or services in the wider suburb. This is also likely to significantly increase land values and rates putting additional cost of living increases on families as it has in other suburbs subjected to significant and rapid urban renewal.

I do not support further residential development on this site due to the serious flooding impacts, the lack of necessary service and infrastructure support growth and the inevitable land and rates increases that will follow.

Traffic and Cycling

Brisbane City Council's Transport, Access, Parking and Services Planning Scheme states that "A development capable of having a significant adverse impact on the external transport system or the adjacent community, including land uses with high trip-end densities should be accompanied by a report addressing the transport impacts of the development which is prepared by an experienced traffic engineer who is a Registered Professional Engineer Queensland."

The State Government has failed to prepare such a report with the 2016 Masterplan and SPRP. No planning at all has been undertaken to determine how the development will impact on adjoining road capacity leading to the site.

The Traffic Report fails to consider the flow on traffic impacts for the older section of King Arthur Terrace, Softstone St, Tennyson Memorial Ave, 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.

Only limited changes to Fairfield Rd are proposed to accommodate turning into King Arthur Terrace – presumably the developer and State Government think people will magically appear at the turning lane by tardis.

The Traffic Report, developed for the 2010 plan, 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.

Further, the Traffic Report modelling is based on the future number of residents living on the site and does not include the thousands of visitors and workers who are expected to visit the precinct every day.

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 shortcomings that the State Government is treating the Masterplan in isolation from the surrounding community.

The proposed fill, raising the King Arthur Terrace Extension and straightening the road is not supported.

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 and future Suburban Route. This was done without notice to local residents who live on the street. Both King Arthur Terrace and Tennyson Memorial Drive are already operating beyond their expected traffic capacity and increasing vehicle movements in the precinct will create further safety and congestion problems.

The plan fails to include separated road cycling facilities on all new streets in the precinct (not just King Arthur Terrace as proposed), particularly those leading to the residential precinct. 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 establish better connections to and from the site. This would free up the footpath for pedestrian use.

As the State Government says this is a transit orient development it would seem bike lanes on all new streets would be a minimum outcome.

King Arthur Terrace bike lanes should be separated and protected bike lanes given the higher order road and coroner's finding's into Rebekka Meyer's death in 2015.

The statement that "connections to the surrounding communities will be improved and 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 Priority Infrastructure Plan 2014 and proposed Local Government Infrastructure Plan (LGIP) 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 supported and will lead to major vehicle and safety incidents. This was a serious safety issue raised in the original 2010 consultation process. If this intersection proceeds it should be fully controlled with stop signs / give way installed on Mooney St/ Local St to ensure vehicle, pedestrian and cyclist safety.

It is noted that the masterplan proposed to remove future access to Tennyson Memorial Drive at the southern end of the site. Provision for public access has been removed and the land in the high rise area is now privately held. The lack of alternative access to the site is problematic and provision should be made for future access should the Council road network change.

The decision to install a pedestrian light to the riverside park without addressing the major safety issues with the current pedestrian thoroughfare between Ken Fletcher Park and the Tennis Centre is plain stupid. A shared zone and speed restrictions are needed due to the increase in vehicles coming to the site and number of pedestrians accessing the riverside park facilities from the proposed development.

Residents in the new precinct walking to Ken Fletcher Park (the only area where community facilities eg playground, BBQs exist) via the proposed east-west connector have no safe crossing point. It is this major pedestrian crossing point that should be upgraded with a shared zone, zebra or green light and reduced speed limit of 10kms, not the newly proposed light half way along the King Arthur Terrace extension.

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.

In December 2016 the State Government further cut the 105 bus frequency and rail services have been reduced in response to the current driver shortages.

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 the 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.

For the past six years residents have been calling for an extension of the City Cat up River to Tennyson and beyond, from the very first public consultation. Our community renews its call for a City Cat service further up river to Tennyson and other suburbs as appropriate.

Putting thousands of new residents into an area with inadequate bus and rail services, without firm, reliable plans for additional public transport, including a City Cat, as is the purpose of 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

The proposed road layout seems inadequate for the density proposed and the proposed public and private parking inadequate to service the proposed residential and commercial areas.

The proposed carriageway widths are 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.

On street car parking widths of 2.1 – 2.5m for the local and neighbourhood street parking aisles are grossly inadequate. These widths should be increased to 2.5m - 2.6m to ensure there is safe access to vehicle parking and no interference with the carriage way. The proposed 2.1 and 2.25m parking lane widths are dangerously narrow especially for 4-wheel drives which are very common.

This will lead to internal conflicts and congestion when up to 3,000 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 the Tennis Centre and Council South Regional Business Centre.

In addition, the site proposes to include a central public parking point in the mixed-use core precinct of 300 spaces. This is grossly inadequate to service the expected number of residents, visitors and workers who will use the site. The lack of parking facilities in the precinct particularly for workers will flood the surrounding residential streets with on-street parking, which is not supported.

Adequate provision for parking for the retail and commercial areas, including minimum car parking number and or ratios should be mandated in the SPRP. Council’s TAPS policy provides for a maximum number of carparks per gross floor metre and this is narrowly interpreted resulting in a lack of car parking. Mandatory minimum ratios should be set to provide adequate parking for workers and visitors to the site in the SPRP.

Reductions in parking ratios for the residential developments on the site are not supported. Due to proximity to Yeerongpilly station, car parking ratios of 0.9 per one bedroom, 1.1 per two bedroom and 1.3 per three bedroom. This should be increased to the minimum standard multi-dwelling rations of 1 space per one bedroom, 1.25 spaces per two bedroom and 1.5 spaces per three bedroom.

Nearby residential communities in Tennyson, Yeerongpilly and Yeronga around the fringes of the site should not have to bear the consequences of inadequate provision for parking. Minimum parking ratios should be conditioned in the SPRP as City Plan 2014 standards are inadequate.

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 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 causes problems and congestion for the surrounding residential areas. A plan should be incorporated into the Masterplan to manage road closures, drop off points and access for major tennis tournament, including the Brisbane International.

The police have regularly raised the safety and terrorism risks to the precinct and the new development fails to recognise that further pressure for vehicles access to the precinct will impact on safety and security.

The current Master planning process is a timely opportunity to revisit arrangements that have 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.

The 2016 Masterplan further reduces the amount of open space than proposed in the 2014 Masterplan which also reduced the amount of green space from that proposed in 2010 which is a poor outcome for the site.

Ken Fletcher Park is a very small park, about 2.5 hectares in total. Two years ago between 400sqm – 600sqm of parkland fell into the Brisbane River and the community facility was lost through demolition. 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 a 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.

Appropriate park facilities for people and dogs including seating, taps, gym, basketball, playground and dog on or dedicated off leash areas should be created in the Masterplan.

An irrigation system for the parklands and gardens should be installed using recycled water.

Community Use

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

The lack of community facilities for a site the size of a whole suburb is negligent.

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 and 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.

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
- a dog off leash area
- general park facilities
- 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 an impractical idea as the lack of sun and excessive shade will not provide ideal growing conditions. This proposal has been badly located/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.

The plan also fails to provide inadequate infrastructure of the proposed parklands. Infrastructure such as seating, taps, bins, water bubblers should be identified. Other general park infrastructure such as a half or full basketball court, a public toilet and adult exercise equipment should be provided by the developer during park construction. A tiny bit of grass and few trees is not enough for up to 3,000 residents.

Equally appropriate public art and signage should be provided.

Stormwater/Sewerage

The area is currently serviced by inadequate stormwater and sewerage networks. A huge development, the size of a whole new suburb, without trunk upgrades is unacceptable and negligent. Regular river, overland flow and backflow flooding occurs in and around the site and will be exacerbated by significant residential and commercial development proposed.

The promised backflow valve to the stormwater outfall with the Brisbane River for the site must be delivered. Removal of references in the Masterplan is not supported.

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.

Stormwater should be captured and reused on the site to service the gardens and common areas of the retail, commercial and residential buildings. This development is an opportunity to develop a best practice system for water reuse to support a sustainable local environment and nothing is proposed. Nothing.

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

The proposed bio retention plaza is grossly inadequate for its purpose.

The deliberate use of the only parkland space as a bio-retention facility in wet weather will further reduce the amount of usable parkland for residents and visitors.

The statement that there have been no complaints about sewerage overflows since 2012 is fundamentally untrue and dishonest. Every time it rains heavily sewerage floods into Allawah and Moolabin Streets, Yeerongpilly at the rear of the development.

A quick check of my records shows that since 2012, my office has lodged the following complaints with Council and QUU:

- Nov 2014
- May 2015
- June 2016
- Jan 2017

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

A new trunk main directly to the Oxley Waste Water Treatment Plant should be installed to service the proposed development.

The proposal to build significant new residential and commercial/retail buildings without any improvements to the existing stormwater and sewerage trunk network is grossly inadequate. This is another lost opportunity between the 2010, 2014 and 2016 Masterplans.

Heritage

The proposal in the 2016 Masterplan to significantly demolish and alter the heritage listed buildings, facilities and curtilage on the site is not supported. The existing heritage buildings were always intended to be at heart to the Yeerongpilly TOD. Instead under the 2016 masterplan they are being demolished, moved, disconnected and reused for commercial purposes. This decision clearly demonstrates that profits not heritage and adaptive community reuse is more important to the State Government.

The precinct's agricultural, social and war history is very significant locally and at a state level. The pattern and connection between the heritage listed buildings will be completely disrupted should this proposal go ahead.

It is also noted that the Developer has already undertaken significant demolition of the heritage listed buildings without Council approval as required. This demonstrates a level of untrustworthiness when it comes to the future demolition and reuse of the buildings.

In particular I object to the:

- partial demolition of the Stock Experiment Station – this building was first opened in 1909 and it is the first of its kind in Australia. The different phases of construction of this building in 1909, 1932 and 1950 all contribute to its significance (Queensland Heritage Register entry);
- demolition of the veterinary school curtilage or a road, significant during the sites use during World War Two is not supported;
- relocation of the stable and morgue is not supported.
- separation and demolition of the heritage precinct buildings for road and pathway purposes – their location is significant and was always intended to form the heart of the TOD redevelopment.

The decision to change from not-for-profit use to allow the commercial reuse of the heritage buildings is not supported. Restoration of these buildings and an adaptive, preferably community reuse, should be a priority of the State Government during the TOD project. The buildings should be identified and protected under a specific zone in the SPRP precinct mapping system. The State should invest funding upfront to undertake these restoration and preservation works.

Streets and parks should be named after historical figures associated with the historic use of the site, men and women who have made a significant contribution to growth and development of Queensland through their service to agriculture and during the War.

Dedicated signage should be erected on a central point in Main Street with historical and direction signage pointing to the heritage buildings. Plaques should be installed on all heritage buildings with a description of their significance to enhance the preservation and community understanding of the historic significance of the precinct.

Trees

All existing mature trees along King Arthur Terrace should be retained and or relocated along the new road alignment. If a tree cannot be saved it should be replaced with trees of a similar size and age.

Native trees and vegetation should be used wherever possible.

SPRP

The overall outcomes for the Yeerongpilly TOD at section 2.1 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.

Reuse of the site for sporting purposes, including expansion of the Tennis Centre, is supported.

The inclusion of medium and high density residential development as shown on Map 3 – building heights and active frontages is not supported in 2.3 Residential Mixed use precinct. The Masterplan clearly shows that many of these buildings are located well within 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.

The heritage buildings should be identified and mapped in Map 1 - Yeerongpilly TOD Area in the SPRP to ensure they are protected.

Part 3 Level of Assessment and Assessment Tables. 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.

Major development material changes of use and development that exceeds height and uses identified in the masterplan should be Impact Assessable to ensure public scrutiny and consultation.

Suspension of Brisbane City Council's Biodiversity Overlay, Heritage Overlay, waterway Corridor Overlay and Wetlands Overlay is not supported. These overlays are to protect significant heritage, biodiversity and environmental values of the specific site and city and should be applicable to the Yeerongpilly TOD development.

The TOD proposal fails to incorporate environmentally sustainable design as a mandatory principle within the precinct, other than single loaded buildings which is supported. The SPRP should condition best practice environmental standards for water reuse and energy efficiency across the design and construction of the residential, retail and commercial buildings. This should include recycled water, photovoltaic solar panel power and other measures to reduce the carbon footprint of the precinct.

Council – State Government Planning

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.

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.

The vague nature of the promises in the Masterplan leave significant opportunity for the State Government to avoid delivering on its commitments and pass responsibility onto Brisbane City Council once the land has been sold / developed. The likely piecemeal development process over many years 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.

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 2014 and fails to adequately address the very real flooding impacts in the event of a natural disaster.

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

Yours sincerely



Nicole Johnston
Councillor for Tennyson Ward