

# Cr Nicole Johnston

*Councillor for Tennyson Ward*



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**New City Plan Submission  
Councillor Nicole Johnston  
Tennyson Ward  
29 July 2013**

Dear Lord Mayor

I am writing to make a submission to the proposed new draft Brisbane City Plan.

Over the past few months hundreds of residents have spoken to me about their concerns with both local and city wide impacts of the proposed new City Plan. Collectively thousands of residents have attended local meetings I have held, signed petitions, signed postcards and written letters and submissions. As such the residents I represent are saying clearly that they do not support the City Plan as you have proposed.

Due to Council's failure to explain the plan, provide hard copies and hold interactive talk to the planner sessions in Tennyson Ward, many thousands of residents will no doubt remain unaware of the plan and its impacts.

Those residents who have actively participated in Council's previous planning process such as City Shape and the Sherwood Graceville Neighbourhood Plan are the most frustrated and upset. Their views have been ignored repeatedly by Council and the issues they objected to then are again being revitalised or even extended in the proposed new City Plan. As a result of Council's failure to listen to the views of residents, the new City Plan fails to reflect their values and aspirations for their neighbourhood and our City.

## **About the Planning Scheme – Part 1**

The 20 year length of the planning horizon under the proposed new City Plan is an extremely lengthy period. This is much greater than previous planning timeframes (approx 10 -12 years for the current process) for Council City Plan. The lack of timely renewal and flexibility in the planning process and timeframes may adversely impact our City's cultural, amenity and economic viability.

To be stuck with bad policy for such a long period of time, together with your Administrations refusal to undertake minor changes in a timely way, is wrong. As a critic of the current City Plan when it was introduced in 2000, I urge you to revise the planning horizon.

The complexity and layout of the new City Plan should be revised to better co-locate all relevant criteria, plans, policies and related materials relevant to a key planning concept in one relevant section.

For example, the current rules of parking requirements for an ordinary house are not located with the Zone or Codes on building a house. This is confusing and some rationalisation of the layout and its interaction is needed.

Hard copies must be made available to Councillors and at key Council offices including libraries to ensure that the 25% of Brisbane residents who do not have computer access can review the City Plan. Given the fragmented nature of the plan and the need to open multiple parts of the documents to find certain development rules, hard copies would also help in reading and understanding this complex document.

### **Strategic Framework – Part 3**

I am concerned that the strategic framework objectives outlined in the new City Plan are not reflected in Council's day to day operation and maintenance issues in the suburbs.

I offer three examples, but there are many more.

**1. Brisbane's local neighbourhoods are not adversely impacted by heavy industrial transport movements** – As Lord Mayor, you have failed to include the recommended Venner Road Freight Bypass in the Priority Infrastructure Plan. This bypass is a recommended solution to help reduce the impact of truck movements and improve safety within residential parts of Annerley, Fairfield and Yeronga. It would also assist to create a more efficient freight network for business and industry in the area.

**2. Brisbane residents' appreciation of character areas, heritage buildings and the city's history is increased and Brisbane's distinctive suburban identity is reinforced by its character housing precincts** – the removal of notification and objection rights regarding the demolition of pre 1946 character homes will substantially and adversely threaten character areas and the community's awareness of them. Demolition of pre-1946 character must be impact assessable under the new City Plan. Creating higher density and infill areas within Character Residential zones will also undermine the protection of Brisbane's unique Character areas.

**3. Brisbane's public infrastructure reinforces a subtropical landscape** – instead of promoting and incorporating landscaping and shade into the street and road network, Council is systematically removing established garden beds from suburban areas as a cost cutting measure. This is not supported and in line with Brisbane's objective to create sub-tropical streets garden beds and trees should be improved and maintained not removed.

The gap between what Council says is its strategic outcomes for the city and the day to day impact of operational decisions is huge and they must be corrected. Strategic objectives are of little value if they are not reflected in the day to day business, decision making and operations of Council.

### **Priority Infrastructure Plan – Part 4**

The proposed Priority Infrastructure Plan (PIP) fails to include a number of key infrastructure priorities in Tennyson Ward and fails to allocate sufficient priority to numerous others.

The following changes are recommended.

- The Venner Road Freight Bypass and associated upgrade of the Ipswich Road/Venner Road intersection is listed in the PIP as a short-medium term

priority – failure to include this important future infrastructure, as you personally promised in 2009 and again in 2012, is a major oversight.

- A dedicated off-road shared pathway (including bridges) is constructed along Sherwood Road between Oxley Road Sherwood and near either Marshal Road or Muriel Avenue Rocklea to provide an east-west connection to the Tarragindi bikeway and beyond.
- Listed trunk drainage upgrades for Yeronga, Fairfield, Chelmer, Graceville, Corinda, Annerley, Yeerongpilly and Rocklea are upgraded as a short term priority for immediate completion. Priority should be given to those areas that regularly experience localised flooding in heavy rain.
- New drainage is built to mitigate flooding and improve local capacity in Sherwood, particularly near Oxley Creek as a short term priority.
- Build a new culvert on Pratten Street and Cliveden Ave Corinda to provide flood immunity for local residents as a short-medium term priority.
- Upgrade Oxley Creek sewerage pipeline, network pump capacity to prevent sewerage spills and infiltration of stormwater network in residential areas of Rocklea and Yeronga for immediate completion.
- Construction of new community facilities including a community hall, and integrated Visible Ink space at the Yeerongpilly TOD Site as a short term priority in line with future TOD master planning.
- Installation of all recommended backflow valves (as per Council's independent report) in Graceville, Yeronga and Fairfield as an immediate priority.
- Acquire and convert the Yeronga TAFE, Chelmer Campus in Glenwood Street as parkland for community use as an immediate priority.
- Acquire, remediate and convert the RSPCA site at Venner Road Fairfield as parkland for community sporting and recreational use as an immediate priority.
- Develop clear long term plans for the future of Oxley Road and the Walter Taylor Bridge including widening (not raising) of the low rail bridge at Corinda
- Create a dedicated off road shared pathway network linking all schools along and just off Oxley Road between the Walter Taylor Bridge and Ipswich Motorway to promote safer active school travel options in the District as a short-medium term priority.
- Upgrade the Graceville Fiveways Intersection at the corner of Oxley Road and Long St as a short term priority.
- Upgrade the Cliveden Avenue Oxley Road, Corinda intersection as a short term priority.
- Upgrade the Ipswich Road / Cracknell Road intersection as a short term priority.
- Upgrade the Ipswich Road / School Road intersection as a short term priority.
- Upgrade Graceville and Annerley shopping precinct through the Council SCIP programme.

### **Tables of Assessment – Part 5**

Council's decision to remove residents' objection and appeal rights by altering the applicable assessment level is seriously flawed and should be amended.

Residents deserve to have a real say about what development takes place in their neighbourhood. They are best placed to provide practical feedback and advice about what constitutes appropriate development. Council's explanation, that the changes to the tables of assessment to allow increased code assessable applications are because they are not controversial developments, is simply wrong.

As a result of Council's decision to blanket code assessment across the city character homes could be removed without community objection, non-compliant small lot development would be allowable, 300sqm blocks near shops and 180sqm blocks in LMR will simply appear and multiple dwellings will be allowed in character residential areas.

Council must convert the following uses to impact assessable to give the community the right to make a submission and appeal:

- non-compliant house in demolition control precinct on a small lot;
- demolition of a house in a demolition control precinct;
- multi-unit dwelling in a character residential area;
- multi-unit dwelling in a low to medium density area;
- small lot sub-division in low density and demolition control precinct areas;
- small lot sub-division in low to medium density areas;
- small lots and dual dwellings on 300sqm with seven metre frontages in low density areas within 200m of shops;
- small lots of 180sqm with six metre frontages in low to medium and medium density areas;
- three storey, 9.5m houses outside flood zones; and
- units in low density areas.

In particular, the removal of community objections for the demolition of pre-1946 character houses is an appalling decision that will lead to the loss of Brisbane's traditional streetscapes.

Council must convert the following uses to Code Assessable to ensure proper independent oversight:

- house in a demolition control precinct.

Brisbane Residents United have described Council's decision to change the tables of assessment as allowing "code bombing" of the city. This allows developers carte blanche to submit development applications that will only be scrutinised by Council officers and not the community who have no legal right to object or appeal. This is short-sighted and lacks fairness and transparency.

I urge Council to revise the tables of assessment to create additional impact assessable criteria to allow residents to participate in the town planning process.

## **Zones – Part 6**

### **1. Future Growth Zone**

I strongly object to the blanket classification of Annerley, Yeronga, Fairfield, Rocklea and Yeerongpilly as a future growth zone. This classification should be deleted from the new City Plan.

Future increased density to medium density across all of these suburbs is not supported and would lead to the loss of significant tracts of tin and timber character homes and backyards in Tennyson Ward.

In addition, inadequate infrastructure currently exists to support higher growth. For example, over the past 13 years Council has failed to invest in known drainage failures in Yeronga and Fairfield. Additional density will exacerbate localised flooding impacts

adversely impacting on any new and existing residents. Council's plans for drainage upgrades are still decades away.

Road, public transport and bikeway networks are currently inadequate and Council has no or limited plans to upgrade essential community infrastructure in the future.

Council has no plans to improve secure significant new parkland for the area and or secure space for community use. Opportunities exist to acquire land from the State Government in Fairfield (RSCPA site), Yeerongpilly (Yeerongpilly TOD site), Yeronga, (Yeronga TAFE), and Rocklea (Oxley Creek Common) which Council has failed to take up.

It is clear from current development applications that developers are already seeking greater density in low to medium density areas, because of this proposal and the message Council is sending in the new City Plan.

I urge Council to remove its classification of Annerley, Yeronga, Fairfield, Rocklea and Yeerongpilly as a future growth area.

## **2. Planned Growth Zone**

The decision to retrospectively classify parts of Sherwood and Corinda as a planned growth zone is not supported and should be deleted from the new City Plan. There are unique geographic, environmental and logistical reasons that the areas are not suited for higher density. For example:

- Oxley Road is already over capacity
- council has no plans to fix choke points at the Walter Taylor Bridge and low rail bridges in the district
- Oxley Road and other roads flood isolating residents often for days at a time
- schools are at capacity and losing valuable green space to accommodate new buildings
- bus services are poor and have been cut by Brisbane City Council this year; and
- train services are often crowded, while stations lack universal access.

This year Council has cut bus services from Oxley Road Corinda, the key arterial distributor in the district, in an area designated as a "planned growth area". This decision shows the stupidity and practical disconnect between Council's operations and policy.

The community clearly advised Council of its objection to higher density and growth in the peninsula during consultation on the Sherwood Graceville Neighbourhood Plan.

I urge Council to remove its classification of Sherwood and Corinda as a planned growth area.

## **3. General Zoning Issues**

The old RSPCA site on the corner of Fairfield Road and Venner Road, Fairfield should be rezoned as parkland for community sporting and recreational use.

A significant portion of the Yeerongpilly TOD site at 641 Fairfield Rd, particularly the flood prone land should be rezoned as parkland for community use.

Character house protections for pre-1946 homes should be reintroduced in medium density areas. These houses deserve protection in suburban areas for their classic architectural style and contribution to Brisbane's unique tin and timber streetscape.

Tennyson Ward is blessed with numerous historic neighbourhoods for example, the Killarney Estate in Yeronga among others and these neighbourhoods and their traditional streetscapes should be protected from demolition and modern infill such as duplexes, terrace houses and modern homes.

## **Neighbourhood Plans – Part 7**

### **1. Sherwood Graceville Neighbourhood Plan**

I note that there have been numerous changes to the Sherwood Graceville Neighbourhood Plan that Council is attempting to slip past the community under the City Plan banner. The community will be unaware of these changes and their impact.

With regard to apparent over-riding of the recently developed Sherwood-Graceville Neighbourhood Plan, it does not make sense that all the effort that went into the process, by both the Council and the community, should be so easily dismissed. Further, it is impossible to compare the two plans. A Town planner advised a resident that the planners intended to map the Sherwood-Graceville plan into the overall document by pulling out sections and incorporating them into the general document. How this has been done and the associated changes have not been made available to the public. Issues touching on this include Corinda and Sherwood being designated a "growth corridor" and plans to widen Oxley Road without clear explanation of how this is to be achieved.

I reiterate my concerns about this neighbourhood plan and reattach my submission on the Sherwood Graceville Neighbourhood plan.

In particular, I urge council to remove the medium density zoning in the residential areas of Corinda and Sherwood and restore the previous low to medium density zones in these areas. Residents do not support five storey and higher apartment blocks in character areas such as Sherwood and Corinda.

I urge Council to protect the Alan Fletcher Research Station has suggested by hundreds of residents in their submissions on the neighbourhood plan.

Residents have also raised concerns about the inclusion of an Interim Critical Route, a route to be used by emergency vehicles if the main route is blocked, and described it as "nothing short of horrendous".

I understand that when a route is designated as an Interim Critical Route it can attract potential changes to such things as street width, corner design and speed limits as well as other effects such as tree trimming/removal, and line marking, This would be of obvious concern not only to residents of this route, but also to other community members who use these streets for accessing local facilities as well as bike-riding, walking etc.

A recent University of Queensland study outlines the serious failure of Council to listen and act on feedback from residents on the Sherwood Graceville Neighbourhood Plan. Their findings demonstrate that residents felt their views were ignored by Council. This is an opportunity to correct those shortcomings and positively amend the Sherwood Graceville Neighbourhood Plan in accordance with residents' submissions.

## **2. Moorooka Stephens Neighbourhood Plan**

The abolition of the Stephens District Local Plan is not supported. This is an appalling decision by Council that flies in the face of the intent of the neighbourhood planning process.

This process when introduced by the LNP Administration was described by Campbell Newman as delivering –

“through Neighbourhood Plans, residents will play a direct role in planning their neighbourhoods or the future...residents input will ensure each neighbourhood retains and enhances its own special qualities, with each Neighbourhood Plan reflecting the unique character and lifestyle of the local community”.

Residents in Tennyson Ward were not consulted at all about the abolition of the Stephens District Local Plan and the removal of specific local planning criteria and guidance contained within that plan.

Joining two already large and disparate local plans together (Moorooka and Stephens) into one super-sized plan covering more than 20,000 homes will lead to adverse impacts that do not reflect street and neighbourhood planning needs or community expectations.

The Moorooka and Stephens Local Plans should be separated and restored in their previous form until reviewed in due course.

### **Overlays – Part 8**

#### **1. Flood Overlay**

I am concerned about Brisbane City Council's (BCC) approval of inappropriate development of flood prone land.

Recent examples include the Tennyson Reach apartments at Tennyson, the Parklands apartments in Egmont Street Sherwood and the Sherwood Bus Depot. All were built in well-known flooding areas and with Council approval.

The BCC approved, and indeed encouraged and expedited these developments despite recurring and recent floods at these sites.

I am very concerned about the proposed land subdivision and development at sites including the former Alan Fletcher Research Station in Sherwood, the old RSPCA site in Fairfield and Yeerongpilly TOD site in Yeerongpilly. These sites all flooded extensively in 2011 (and worse in 1974) and under Council's flood planning policy can still be extensively built on.

Also of great concern is the nomination for development growth of very low lying land in Rocklea. The extensive recent use of fill at Rocklea and Sherwood Bus Depot, is most unfortunate, as it will exacerbate flooding of neighbouring properties and change the natural flow of water in the area.

The BCC have a duty of care to protect residents they serve from such inappropriate developments on flood prone land.

Council's decision to designate the 2011 flood level as the (TLPI) planning flood line is short-sighted. The 1974 flood level was several metres higher than January 2011 and by designating it as the flood line may give residents a sense of false security about possible future flooding levels just as the Q100 did.

The concept of additional flood planning and advice for residents when building is supported, however, Council has added enormous complexity to the process via its changes to development and building approval in known flooding areas.

In addition to zoning and code requirements for building a house, residents in Tennyson Ward may have to apply multiple overlays including Neighbourhood Character, Dwelling Character House, Flood overlays and several others. The additional requirements require a registered engineer to oversight building standards but these standards are not clear in the City Plan – they appear to be left to the individual discretion of an engineer and their professional standards. This is likely to add extraordinary cost, complexity and stress onto both existing and new residents who undertake major renovations or new building in known flooding areas.

Consideration should be given to streamlining the layout and application of these rules within the City Plan to make it easier for residents to access planning requirements.

The complexity of the Flood Overlay Code is extraordinary and I suggest would be incomprehensible to ordinary residents. Council must simplify this Code and the rules associated with building in known flooding areas.

Given the significance of these changes to thousands of residents across the City, I urge Council to write a personally addressed letter to those owners outlining the additional planning requirements that they will be required to follow in future. Consideration should also be given to flagging the Flood Overlay requirements on the Floodwise Property Report to inform future purchases of the building and planning rules.

The Queensland Flood Royal Commission noted that land uses involving hazardous chemical use in known flooding areas should cease. I note that this recommendation has not been reflected in the new City Plan by Council.

Any undeveloped or vacant land that is currently zoned for community, industrial and commercial use, in the known flooding areas classified as FPA1, FPA2 and FPA3, should have some building prohibitions. For example, certain types of invasive industry, manufacturing and hazardous uses should not be allowed within Rocklea and surrounding industrial areas should existing uses cease in future. No new uses as recommended by the Flood Royal Commission should be approved or allowed by Council.

Council must also consider restricting future land use capability in areas that have not been developed to date to ensure the problems of building industrial, commercial or residential properties in known flooding areas are not exacerbated by continued inappropriate development.

The contamination and destruction that resulted from the January 2011 floods along Oxley Creek and surrounding residential and parkland areas was extraordinary. The cost to businesses was also extremely high.

Finally several residents have expressed concerns about the accuracy of the Flood Overlay maps. Given the significant consequences if these maps are in correct, I



suggest that they are independently verified by experts and also ground truthed with residents in various locations around the City including Tennyson Ward.

## **2. Neighbourhood Character Demolition Overlay**

More needs to be done to prevent the partial demolition of pre-1946 character buildings across the City. The integrity of character buildings should be preserved consistently across the City not just the façade.

### **Section A PO1**

Developments involving partial demolition or refurbishment of a dwelling house constructed in 1946 or earlier as part of refurbishment or extension work does not diminish the traditional building character elements of the building.

Demolition or removal should only be allowed on two criteria, not the four proposed in the new City Plan.

### **Section B AO5**

Development involves a building which:

- (a) an engineering report prepared by a RPEQ which certifies that the building is structurally unsound and not reasonably capable of being made structurally sound; and
- (b) the demolition of which will not result in the loss of traditional building character.

Any development application lodged with Council without the relevant report above should be automatically refused. Any engineering report recommending demolition should be independently reviewed by qualified Council engineers, including an onsite inspection of the subject property.

Demolition or removal for any other reason is not supported.

## **3. Neighbourhood Character Design Overlay**

Council is currently failing to enforce existing character infill design standards. Modern houses are common alongside character houses in demolition control precincts. In my view this is both a policy failure and regulatory failure.

Additional criteria need to be included in the Code to compel submitters to provide photos of neighbouring and nearby character homes and a tabular assessment of how the proposed building meets building design features, standards, forms, materials, themes/styles, height, bulk, scale and other relevant criteria.

Any development application for infill in a character area should be independently reviewed by qualified Council architects, including an onsite inspection of neighbouring and nearby properties to ensure compliance.

## **4. Waterway Corridor Overlay**

No fill in known waterway corridors is supported. If fill or excavation is proposed it should be an impact assessable development application.

## **Development Codes - Part 9**

### **1. Dwelling House Code**

House heights of 9.5m or above are supported in known flooding areas to achieve flood immunity. House heights in others part of the City should remain at 8.5m.

Built to boundary walls should not be permitted.

I strongly object to the removal of Gross Floor Area as a tool to limit the bulk and scale of developments. It is common now for developers in low to medium density areas where GFA limits are 50% to apply for 70% to 80% GFA. This includes for example Waldheim Street Annerley, Eversley Terrace and Days Road Yeronga and many others. This is appalling planning policy and is not supported.

GFA provisions in the existing City Plan should be retained and no performance solutions offered.

The provision to remove GFA will result in huge, bulky buildings that may adversely impact on the traditional streetscape and pattern of suburban residential areas.

### **2. Fill and Excavation Code**

No fill is supported. In residential areas where known flooding occurs fill creates flooding, drainage and overland flow problems for neighbouring residents. My office sees problem after problem in residential areas that that been filled and approved by Council. In the months and years afterwards significant drainage problems arise due to inadequate planning and drainage approval.

Council's plan to increase fill levels from 1m to 1.2m in residential zones and to 2.5m in industrial zones is not supported.

### **3. Multiple Dwelling Code**

The minimum block size for units in low to medium density areas should be increased to 800sqm with a 20m frontage. Council has allowed non-compliant building on blocks smaller than 600sqm in many parts of the City, for example Lagonda Street Fairfield and is considering several non-compliant five storey buildings in Sherwood, where the proposal does not meet the minimum 20m frontage. This is appalling planning policy and is not supported.

I do not support multiple dwelling heights of 11.5m and three storeys in low to medium density areas. Heights should be reduced to the current City Plan height limits.

The extension of increased storeys and height from 200m of the entrance to a busway or rail station to 400m walking distance to railway or busway station is not supported.

No built to boundary walls should be allowed for multiple dwellings where they adjoin any detached house, townhouse or unit block.

Building separation requirements are inadequate and do not promote sub-tropical design standards regarding cooling breezes and amenity. These should be increased.

The minimum block size for medium density areas should be increased to 1000sqm.

Setbacks for medium density multiple dwellings should be increased.

GFA provisions in the existing City Plan should be retained and no performance solutions offered. Minimum block sizes should be just that.

The provision to remove GFA will result in huge, bulky buildings that may adversely impact on the traditional streetscape and pattern of suburban residential areas. Pictures in the Multiple Dwelling Code (p13-14) clearly demonstrate the type of monolithic unit towers Council is expecting to see flourish across Brisbane. This solution is not supported. Existing GFA provisions should be retained and enforced.

#### **4. Subdivision Code**

I strongly object to the provision of extremely small blocks of 300sqm and 7.5m frontages within 200m of shops frontages in low density areas. I object to dual dwellings on these blocks. This provision should be removed from the City Plan.

I strongly object to the provision of extremely small blocks of 180sqm and 6m frontages in low to medium density residential and character residential areas. This is simply too small and will dramatically impact on Brisbane's traditional and residential suburbs. This provision should be removed from the City Plan.

I object the provision of any units and townhouses in low density areas. I support one dwelling per block in low density areas.

I support retention of 450sqm as the minimum block size for houses. Council has allowed numerous block splitting examples of less than 400sqm throughout parts of Tennyson Ward including Yeronga, Graceville and Corinda. This is appalling planning policy and is not supported.

The provision of built to boundary walls, terrace style houses in low to medium density areas across all parts of the City is not supported. If this type of housing is appropriate it should be specifically provided for in a neighbourhood plan in consultation with the community, not undertaken in a blanket way as currently proposed in the new City Plan.

The minimum block size for units in low to medium density areas should be increased to 800sqm. Council has allowed non-compliant building on blocks smaller than 600sqm in many parts of the City, for example Lagonda St Fairfield. This is appalling planning policy and not supported.

The minimum block size for medium density areas should be increased to 1000sqm.

The community supports minimum block sizes that are mandatory, that is, no performance solution is supported, and no relaxation should be allowed by Council to allow for inappropriate building by developers.

A clear rear boundary and set back should be nominated for corner blocks in addition to standard side and front set-backs.

#### **5. Secondary Dwelling Code**

I do not support the increase in the size of granny flats from 70 sqm to 80sqm. This is bigger than some three bedroom apartments and will significantly impact on backyard patterns and neighbours amenity and privacy.

## **6. Transport, Access, Parking and Servicing Code and Policy**

It is clear that Council's current parking requirements for low to medium density and medium density zones, particularly for multiple unit dwellings, is inadequate.

Council's current lax application of parking ratios in and around Multi-purpose areas needs to be tightened and the number of spaces required by businesses must be increased to lessen the impact on adjoining residential areas. Safety and congestion problems are evident in numerous MP3 areas including around Graceville, Sherwood, Annerley and Corinda. Council's decision to focus even further density in existing areas near rail stations and shops clearly shows little understanding of the existing problems with kerbside space constraints now.

Parking ratios will significantly change under the proposed new City Plan for the worse. For example, the requirement for only one off street parking space per dwelling is seriously inadequate.

Parking ratios should be increased not decreased under the new City Plan. Changes should be made to ensure that any residential development has sufficient onsite parking, higher than the current City Plan ratios, including visitor parking of at least 50% of unit numbers to prevent overflow and congestion on the street.

Where two parking spaces are proposed to meet parking requirements they should be side by side not tandem spaces. Tandem spaces are useless and essentially used as one space.

### **Miscellaneous – Part 11**

Relaxations and variations are not supported. Building certifiers regularly ignore the concerns of neighbouring residents who submit valid objections. Non-compliance with setbacks, fence heights, garages and other common residential relaxations should activate a higher assessment level by Council town planners.

### **Conclusion**

Finally, I would like to express my concern, as I did in the Council debate last year about Council's consultation process.

Providing the plan only in electronic form has been a major detriment to proper informative consultation. It immediately excludes those who are not computer literate, up to 25% of all Brisbane households do not have a computer. Further the complex of the document, tables maps and policies is extremely complex and difficult to navigate on a computer alone.

Brisbane City Council has not conducted a single "Talk to the Planner" session in Tennyson Ward, despite major changes being proposed in my Ward by your Administration.

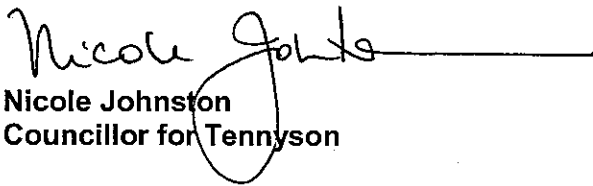
Having seen the "Kiosk" session at Fairfield Gardens that was clearly an inadequate consultation method, as it simply included public relations officers, not experts and involved handing out fact sheets, not the detail of the City Plan itself.

As such I do not believe that you have engaged in a genuine and in depth public information and consultation process. That is unfortunate given the major changes in the new City Plan both locally and across the City.

In addition, you should be aware that my requests for additional Council flyers, including complex colour coded maps of the new City Plan was refused by a senior Council officer further limiting access to materials and information for residents.

Your approach to the new City Plan both with Councillors and the community has been short-sighted and in my view unless serious modifications are undertaken to the new City Plan and further genuine public consultation that includes incorporating residents' concerns into any future draft undertaken, this proposal will lead to serious adverse community impacts for decades.

Yours sincerely

A handwritten signature in black ink that reads "Nicole Johnston". The signature is written in a cursive style and is followed by a horizontal line extending to the right.

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