



Save Our Riverfront Bushland

PO Box 155 Mt Ommaney Qld 4074

Convenor: Maree Norris

Secretary: Ed Parker

Email: info@sorb.org.au

Web site: <http://www.sorb.org.au>

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Westgate Project Director
The Coordinator-General
PO Box 15009
CITY EAST 4002

Dear Sir

Submission on the Westgate Strategic Plan

Please find attached our submission on the Westgate Strategic Plan.

Yours faithfully

Maree Norris
Convenor
Save Our Riverfront Bushland (SORB)

*Save Our Riverfront Bushland (SORB) is a community group that has been active in Brisbane's south-west suburbs on planning and natural resource management issues since 1991. It also spearheaded the first bushland rehabilitation volunteer group to establish on the Brisbane River riverfront, in 1993, namely the **Westlake-Riverhills Bushcare Group**. Refer website: <http://www.sorb.org.au> established since 1996.*

1. Consultation processes and base documentation

Before addressing the planning issues and the elements of the options as presented, it must be said that the consultation process undertaken is considered grossly inadequate.

This is surprising, given that the Westgate planning study has been on foot for several years and this the first involvement of the community. Further, the timetable in the November 2005 'newsletter' implies this current, short display and feedback period will be the last before the preferred option is developed in 2006.

For an area the size the Westgate study area, with its strategic environmental and open space values, and potential impacts within the broader context, the level of base data and supporting information for the options development is unsatisfactory and does not support a credible consultation process.

Coupled with the lack of documentation, the timescale of a few weeks public display is insufficient for the community to adequately address the far-reaching implications of the options, both in the broad and in the detail.

A credible consultation process cannot proceed without the tabling of base information on the physical attributes, constraints and opportunities of the site, independently of the options subsequently developed.

In the process presented to the community in this exercise, some of the site features and opportunities have been identified but incorporated within the options. Without such features being separately and comprehensively mapped, as base information independent of any options development, causes the following process deficiencies:

- the respondents during an already limited feedback period have to generate their own research. That sort of research should have been made available; and
- there is the prospect, in further synthesising the options down the track, that key site features will be dropped off the plan and off the radar altogether.

The community could be forgiven for thinking that either the research was not undertaken, or that documenting such base data would highlight the inconsistencies between the options and the site values.

The consultation process does not accord with any of the recognised or legislated models for consultation, whether under IPA, regional planning, or the government's own process, for example for Ministerial Designations. The options as presented, if they move forward to approval stages in some form without due and proper consultation, would pre-empt decisions that ordinarily would need to be the subject of defined consultation mechanisms.

In a climate where state government is (rightly) calling in flawed development assessment decisions taken by local government elsewhere in the SEQ region, it is therefore surprising that this state-initiated study seeks to jump to fast-track significant land use decisions without recourse to appropriate and orthodox planning and consultation mechanisms.

The remaining comments in this submission need to be viewed with the above reservations in mind.

2. Town planning - statutory planning instruments

The Westgate options appear to have been developed with no recognition of or justifications against the various layers of statutory planning.

2.1 Brisbane City Plan

In relation to the statutory Brisbane City Plan, neither the study's broad analysis and nor its options development makes any reference to existing **Brisbane City Plan 2000**, as at July 2005. For example, the Westgate study:

- ignores and conflicts with the **Strategic Plan** and its Green Space system and values;
- ignores and conflicts with the **Western Gateway Local Plan (WGLP)**.

(While it is noted that the state has previously prevented the implementation of BCC proposed amendments to transfer area classifications from Special Purposes to Conservation, the WGLP remains a valid document within the City Plan in its present form.)

2.2 SEQ Regional Plan

While broad statements are made about the western growth corridor, there is no specific reference to the **SEQ Regional Plan** nor justification why the proposed developments should proceed in that context.

2.3 Vegetation management and biodiversity protection

The state's own legislation, the **Vegetation Management Act**, contains planning provisions for the protection of **regional ecosystem (RE)** values, of which there are endangered REs, both at the dominant and sub-dominant level, as officially mapped at the 1:100,000. In our reading, the newly released version 5 (December 2005) of this mapping maintains the previous classifications for the study area. However, the study has not acknowledged, in mapped form, the presence of these REs.

At the more detailed level of vegetation and biological mapping undertaken by Brisbane City Council, there is comprehensive mapping information which has not been referenced nor utilised in developing the options. In fact, key elements of the development options occur precisely on areas that have significance at either state, regional or local levels.

Local governments in South East Queensland Regional Organisation of Councils (**SEQROC**) have adopted the Common Nature Conservation Classification System (**CNCCS**) as part of local government's statutory obligations under the Integrated Planning Act (1997) (IPA), section 2.1.3.(1).

That mapping and classification work undertaken by BCC under CNCCS appear to have been ignored.

BCC has also defined areas of significant **waterway** and **wetland** values that have not been adequately addressed in the Westgate options development. Again various elements of the respective options conflict with these planning instruments.

3. Planning Context - relationship of study area with surrounding region

The immediate regional context for the Westgate study area includes:

- Fully developed residential areas to the north (Centenary suburbs), to the east (Sinnamon Park, Darra), to the south (Gailes, Carole Park); and
- Both developed and further developing large areas of industrial development to the north-east (Sumner), east and south-east (Wacol, Richlands);

All of these lands immediately surrounding the Westgate site are or will be densely developed with an under-proportion of open space. The existing institutional land uses in Westgate, while having some built environment footprints, and open space and bushland not accessible to the public, still provided breathing space for the lungs of the local and regional community in their present form.

The Westgate options, except for the transport routes bisecting the study area (see later transport comments), appear to treat the study area in isolation from its context.

While the Westgate options and associated feature summaries acknowledge the environmental values and a need for a network of ecological open spaces, in practice there is a significant reduction in the 'breathing space' for the regional community surrounding the study area. Indeed the areas of open space and ecological spaces are not quoted in the land use area totals as if they do not qualify for a valid use against the 'development' uses which are documented in hectares. Those biological areas do need to be recognised as valid land uses in their own right.

There may be merit in converting the industrial land uses in the Wacol station precinct into a transit-oriented development (TOD) of medium density housing, including affordable housing, and commercial development. However, there is insufficient information on the proposal to make definitive comment and local residents need to be engaged in the further development of such a proposal.

Industrial uses should be confined to south of the Ipswich Motorway, as stipulated in the Western Gateway Local Plan.

However, when viewed in the above context, it is poor planning to simply add more of the same, residential and increased areas of institutional footprint (see later re police training academy), at the expense of breathing space and ignoring the already fully developed or developing areas abutting the study area to the north, east and south.

There is insufficient regional context analysis provided to justify the development options. It is not considered acceptable to merely justify development on the generic premise that this site is simply part of the south-west 'growth' corridor.

Social, environmental and traffic impacts do not appear to have been assessed, and if so, that information has not been presented for public information and to assist the public in formulating its comments in this round of information display.

4. Planning - over-concentration of institutional uses

The Westgate study area has suffered poor planning in the past through:

- Focusing on institutional uses of the sort that previously were tucked away in a forgotten corner of the city, as it was then;
- Lack of public access to some key natural areas such as the Brisbane River riverfront
- A concentration of corrections institutes;

- Adverse impacts of both built infrastructure and some agricultural uses on the riparian and other environments of the study area. (Lack of baseline environmental studies suggests that these impacts have not been assessed or at least acknowledged.)

We laud the intent expressed to redress some of these past adverse impacts:

- by providing continuous public access along the river; and
- by the intent of "an integrated network of ecological open spaces"

The upside of the pre-existing institutional uses, while restricting public access, is that they did provide large buffer areas for the lungs of the community and for wildlife grazing and refuge areas.

However, the actual open space network expressed in the options is considered inadequate, in terms of connectivity and buffers, when coupled with existing institutional uses and a large new use in the police academy.

The success of the community-initiated action, subsequently supported by both state and local government, to have the Federal government handover the so-called Pooh Corner land for conservation behoves that state government to ensure that this site does not become a biological 'island' surrounded by state institutions.

5. Police Academy

The various options show differing footprint sizes for a possible police academy. It is also not clear what is the extent and nature of the 'buffer areas'.

For example it is likely that large areas of the buffers could sustain wildlife, or will fauna, as well as humans, be kept out of the buffers for security reasons? If the intention is for the police academy at this location to include land for terrorist training utilising the few remaining bushland areas, we would be opposed to that type of land use in this closely settled surrounding area and given the value of these remaining vestiges of remnant native vegetation.

Note that the Youth Detention Centre was developed in the last decade by destroying remnant vegetation when instead it could have developed on already cleared land in the overall precinct. Expansion of the Youth Detention Centre (as has been suggested) and a new police academy has the potential to make significant inroads into remnant vegetation and feeding and shelter areas for fauna.

The footprint for police academy in all options, except Option 4, conflict with the city council's **CNCCS** mapping (see section 2.3 above).

5. Transport connections

It goes without saying that there are significant transport issues in the Brisbane-Ipswich corridor, associated primarily with the Ipswich Motorway. There are uncertainties in the Federal government's intentions which impact on the southern portion of the study area.

Beyond that significant and problematic issue with the Ipswich Motorway corridor, for the rest of the study area the options presented seems to sacrifice the integrity of the study area by bisecting it with major roads criss-crossing the site in all directions.

Given the already significant traffic problems with the Ipswich Motorway and Centenary Highway, neither of which are going to be solved in much less than a decade in presently identified state government forward funding priorities, it is inappropriate to add additional major traffic generating development.

The study information displayed to date makes provides no statement on traffic generation due to the development and the capacity of the adjacent Ipswich Motorway and Centenary Highway corridors to handle this.

Further, there is no differentiation or quantification of traffic requirements specifically to support the Westgate development traffic generation and that for the road corridors identified for regional purposes.

The upgrading of existing roads and creation of new roads will be counter-productive to maintaining fauna corridors for major ground fauna including kangaroos and koalas, as well as for smaller ground-dwelling fauna.

6. Environmental and ecological values

It is unfortunate that the study to date has not documented the baseline environmental conditions and values. If the study did cover this, then why was this baseline information not made available to assist public comment?

By leaving the environmental and landscape values to be expressed only indirectly through components in the options is a flawed process. As the options undergo further distillation there is the risk that what values are expressed and preserved in present options may be lost with no baseline against which to test new options.

Project staff, when asked about the lack of environmental studies documented in the displayed information, demonstrated a lack of understanding of proper statutory and environmental planning processes. Their answer was along the lines that when development options are progressed, environmental impact statements will be prepared at that stage.

However, the concept of identifying and documenting existing environmental constraints and opportunities as a baseline against which to test options at the present stage does not appear to have been followed, or at least made available for public comment. Refer also to comments provided in section 2. above.

The aspects of environmental values and constraints to be documented should have included: mapping of remnant vegetation; classification of same; topographical constraints and opportunities (slope analysis, viewsheds, landscape values, etc.); flora and fauna investigations; air and water quality analyses; etc.

7. Pooh Corner

The so-called Pooh Corner site is bounded respectively on the west, north and east by Wacol Station Road, Wolston Road and the railway line.

This was the subject of a concerted and successful community campaign against the Federal government's intention to dispose of the environmentally-significant site to market.

Contrary to some views expressed by some that this site was won purely on emotion, the campaign was based on publicising the clear fact that the majority of the site was protected against development. That protection arose under the state government's own Vegetation Management Act and the endangered Regional Ecosystem status of the site. Refer section 2.3 above.

As it turned out, it took community action, not state or local government action in the first instance, to bring public and government attention to the Federal government's disregard for the state's statutes and planning instruments. However, both state government and local government, and Federal members of both main parties, came to support the community's initiative in bringing attention to this matter. It was largely through the efforts directed by the community group, **Friends of Pooh Corner**, and its supporters both individual and other community groups, that achieved the protection of that site.

We note that the study correctly acknowledges the Pooh Corner as deserving of protection. However, we submit the following concerns:

- The site is almost turned into a green 'island' with limited green linkages to other parts of the study area to the west;
- The introduction of new roads and upgrading of existing roads, as noted earlier, will be a major threatening process for fauna, including in particular the Eastern Grey Kangaroo population for which the area is renowned.
- Apart from upgrading of the road system in all options impacting adversely, we also oppose the specific incursion of the north-south road link across the south-western corner of Pooh Corner.
- Beyond Pooh Corner there are also abutting areas with significant vegetation that has not been documented or protected in these options.
- It is not clear what is the nature and footprint of the 'sustainability centre'. However, the concept of an environmental educational and interpretive facility is worthy of consideration, so long it is developed in sympathy with and not unduly impacting on the natural bushland values of the Pooh Corner. To that end it may be better placed at the edge of the site, where access is better and impact is less, for example at the current western limit of Wolston Road.

The Eastern Greys here are the only remaining macropod population in the greater Brisbane area. Not only that, Brisbane is likely the only capital city that can boast such macropod fauna still resident close to populated areas. This colony of kangaroos provides a source of enjoyment for passers-by. Indeed, many people who know of their presence here will bring visitors to Brisbane to view kangaroos 'in the wild' as it were, rather than going to the more artificial environment of Lone Pine or other such venues.

There is also evidence of koalas residing in and moving through Pooh Corner and the surrounding bushland.

In some quarters it has been suggested that fauna studies show that the macropod populations in the study area are genetically isolated from other areas outside the study area.

Firstly, this is an example of baseline studies that should be made available for public information and scrutiny, as noted in section 6. above. Secondly, even if this is so, it is no justification to further diminish the sustainability of the populations through further fragmenting and dissecting the site, as is done in each of the options.

8. Cultural and Heritage values

Some of the more undisturbed parts of the study area may be the subject of indigenous cultural relics, as indicated in the preliminary cultural heritage reviews as part of the due diligence reports prepared by the Federal government in respect of Pooh Corner. Those reports recommended further studies to identify the extent of such occurrences.

As for more recent, European history, the retention of Wolston House together with buffers around it and extending to the riverfront is supported.

Comments about the environmental values of Cockatoo Island are made in the next section. However, from a European historical perspective, the island is significant in that John Oxley's journals of both his journeys up river in 1823 and 1824 refer to it. Indeed, Oxley named the island 'Termination Island' because that was the limit of his first expedition in 1823. His journal documents botanical species found when he and his party went ashore nearby the island.

9. Cockatoo Island and the concept of an aquatic centre

As noted above, Cockatoo Island has a historical connection with John Oxley expeditions but it also has environmental values, including as a refuge for birds and other wildlife. We therefore support actions which seek to preserve the natural environmental features of the island. We are not persuaded that constructing bridges across to the island will significantly enhance community's appreciation of the natural and scenic values, given that this would be at the expense of impacting on the island as a refuge for wildlife.

For similar reasons, while we support low-scale (non-motorised) aquatic uses at the river, we do not believe that this aquatic land use should be placed at or too close to the island.

There are also regionally significant values at Cockatoo Island that are identified in BCC's CNCCS mapping that have not been referenced in the the study (see also section 2.3 above.)

10. Sandstone Quarry

There is no documentation on the intent, rationale and justification for the 'sandstone quarry' identified on all options. This use is inappropriate for the following reasons:

- Appears to involve destruction of the Brisbane Rive riverbank;
- Coincides precisely with significant features identified in BCC's CNCCS mapping (see section 2.3 above).

11. Use and enjoyment of the river corridor

We fully support the principle of providing linear public access, for passive pursuits, along the full length of the Brisbane River within the study area and linking to neighbouring facilities. This use should be provided for without damaging the riparian corridor and by rehabilitation as a natural bushland corridor. The reaches of the river in the study area are badly infested with Chinese Elm, progressive rehabilitation would be possible over a period of time with concerted action.

Other reaches of the Brisbane River in neighbouring areas provide testament to bushland rehabilitation opportunities that have been tackled by volunteer groups. However, the extent of weed infestation along the riverfront in the study area through neglect over the years of institutional use is beyond what any volunteer group could manage.

12. Provisos

This submission has been prepared at short notice and we reserve the option of making further submissions, additions and/or corrections as additional information comes to hand.

Prepared by

Save Our Riverfront Bushland (SORB)

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