

Submission on Development Application No. A001903034 for a Material Change of Use, Development Permit for Outdoor Sport and Recreation at 260 Wacol Station Road, Wacol 4076, described as Lot 487 on SL12664, Parish of Oxley, County of Stanley

Response from Centenary and District Environment Action Incorporated (CDEA)

25 November 2007

To: **The Assessment Manager**
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Excessive area set aside for sports fields

At present the West Centenary Junior League Football Club occupies approximately **10 hectares** adjacent to the Centenary Highway. Members of our organisation were told by a representative of Main Roads that the area of the replacement facility would be approximately **7 hectares**. However the plans posted on the BCC website show an area of **17.4 hectares** is proposed and will be excised from the government land for the sportsfields.

This is two and a half times the figure originally given and our organisation is of the firm opinion that this is excessive. We believe that the design of the sports field facility needs to be reviewed and tightened up. If this does not occur and a reasonable amount of land excised for the proposed sports fields facility, then BCC should refuse the application for a Material Change of Use.

Our main reasons for concern are:

- All of the area within the perimeter fence will no longer be available to the estimated 1350 Eastern Grey Kangaroos that presently live in the locality as well as other local wildlife: and
- The area may not be accessible to the public in general.

In August 2006, the then Premier, Peter Beattie, approved a plan for the 'Westgate' area of State-owned land. It included **approximately 200 hectares for public recreation and open space**. By fencing off the proposed sports field facility, this land will no longer be available to the kangaroos and other wildlife. In addition, the public needs to be reassured that the general community will still have access to the site.

If the prospect of kangaroo droppings is suggested as a risk and an excuse for exclusion fencing of the site, we reject that proposition. Firstly, the fields alone need to be fenced, not the whole site. Secondly, the prospect of kangaroo droppings presenting a health risk does not appear a tenable argument. There are many examples of public areas, including picnic areas, where native animals are not excluded on health risk grounds.

Area north of Fields 3 and 4

There is no apparent reason why this area needs to be included as part of the sports field facility. It is well outside the dead ball area required for sports fields.

Area between Fields 3 and 4

There appears to be no purpose for this area or good reason for it to be left open. We believe this would be better suited to be used for Field 4 and the overall area of the sports facility reduced.

Stockpile areas

On the drawing titled AREA 60 – SPORTS FIELDS GENERAL ARRANGEMENTS SHEET 1 OF 1 STOCKPILES ARE SHOWN NEXT TO Fields 3 and 4. Our organisation believes that valuable Public Open Space should not be used for stockpile areas. Any excess earth should be removed from the site.

Overflow parking area

There is no good reason why this area needs to be included inside any fenced area. It is grassed and will be used infrequently.

Unreasonable amount of area designated for roads

The layout of internal roads could be improved so that less space is required for access to facilities and parking.

Danger to kangaroos and vehicle occupants on approach roads

No measures are shown for mitigating or preventing death or injury to kangaroos or vehicle occupants from any collisions that will occur on the approach roads to the sports fields. Kangaroo deaths occur frequently under present traffic conditions. They are bound to increase relative to the increase in traffic using these roads to access the sports fields.

The inclusion of lighting plans in the application documents indicate that games will be held at night. This will exacerbate the danger of death or injury to kangaroos or vehicle occupants as kangaroos are generally nocturnal.

Measures to prevent death or injury to people and kangaroos on the approach roads need to be included in the application for an MCU.

Protection of existing site and footpath trees.

On drawing titled AREA 60 – SPORTS FIELDS WATER AND SANITARY DETAILS SHEET 1 OF 1, under the subheading VEGETATION PROTECTION, item 1, it states: 'Trees located along the footpath should be, where possible, transplanted prior to construction, or replaced if destroyed.'

This is completely unacceptable. The design should work around and protect all existing trees, including those on the footpath. Representatives of SafeLINK assured our organisation that the trees on site and on the footpath would be protected. Most are too large to be successfully transplanted. If destroyed the trees would take decades to grow to the size of the existing trees. At present, trees are being planted all over Brisbane to help counter-act Climate Change, it makes sense to retain established trees.

Item 2 describes the use of tree guards to protect trees. These are practically useless as they do not protect trees from damage from any impacts by site machinery and do not protect from ground compaction by vehicles or damage caused by the stock piling of materials under trees. More effective protection is provided by fencing off the root zones with temporary fencing positioned 1 metre around the outside of the drip line of all trees.

Measures to protect existing trees on site and on the footpath are unacceptable and need to be reviewed before any MCU can be granted.

Proposed vegetation species

On drawing titled AREA 60 – SPORTS FIELDS PLANTING PLAN SHEET 3 OF 3 is a plant schedule. The following species are not local and need to be replaced by local species. A copy of the local species plant list has been provided by this organisation to SafeLINK.

- *Eucalyptus propinqua* grows in moister areas and is easily confused with *E. major* which is local.
- *Ficus microcarpa* 'Hillii' is not local. Local figs are *F. rubiginosa (platypoda)* and *F. virens*.
- *Pultanaea villosa* is not local. *Pultanaea cunninghamii* and *P. retusa* are local.
- *Syncarpia glomulifera* is not local.

In addition, there are good local native plant species for landscape use, there is no need to use cultivars. This is a natural area and the native plants will add to its local character as well as being suited to the local growing conditions and local fauna use.

Prior earthworks and fencing approval

We strenuously object to the fact that fencing and major earthworks across the whole site is already well underway. In our view, it is an abuse of the provisions for public notification that such an extensive prior approval has been granted, given that the period for submissions has not yet closed, let alone the proposal having been properly assessed.

Conclusion

We request, for all the reasons noted above, that the Development Application for a Material Change of Use No. A001903034 be refused.

Thank you for the opportunity of making this submission.

Yours sincerely,

Shealagh Walker

President

Centenary and District Environment Action Incorporated (CDEA)