

**Submission on
Development Application 948778
Lots 3 - 6 on RP79830, Parish of Oxley
140 – 160 Bellwood Street, Darra, 4076**

by

Centenary and District Environmental Action Incorporated (CDEA)

7 December 2006

To: The Chief Executive Officer
Brisbane City Council
G P O Box 1434,
Brisbane QLD 4001

Fax no. 3403 5379

From: Shealagh Savage, President
on behalf of
Centenary and District Environmental Action Incorporated
P O Box 515,
Mount Ommaney QLD 4074

07 3376 1287
shealagh@optusnet.com.au

Centenary and District Environment Action Incorporated (CDEA) is a community environmental group which focuses on protection of the natural environment, public parkland and recreational areas and the mitigation of urban development impacts within the Centenary suburbs and neighbouring areas.

Environmental impacts

Ecological corridor

The bushland to the north and west of the CSR site is part of the ecological corridor which runs continuously, other than two road crossings, from the Edenbrooke bushland area through to Atthows Park. Generally it is part of the extensive ecological corridor that runs from Rocks River Park on the Brisbane River corridor at Seventeen Mile Rocks through to the bushland and rural land at Wacol where it reconnects with the Brisbane River corridor.

The CSR site development cuts into the ecological corridor bordering the property, causing a 'pinch point'. This reduces the viability and functioning of the entire corridor. The wider this corridor is, the more sustainable it will be.

This ecological corridor is used by a wide range of wildlife. The corridor north of CSR is known by local residents to contain wildlife including wallabies, kangaroos and bearded dragons. The trees have many scratchings on them that need to be investigated. These are possibly from koalas, squirrel gliders, goannas, ringtail and brushtail possums. Over 90 bird species have been recorded.

Other species that occur in the local suburban area are echidnas, water rats, bandicoots, flying foxes, bats, goannas, water dragons, carpet pythons, other snakes and reptiles, frogs. This is remarkable in a suburban area and it is probable that all of these use the corridor adjoining the CSR site.

Whatever the classification of the bushland, it has an important value of its own being an urban remnant. Its classification is of no consequence to the wildlife who use it as habitat. Although there is serious risk to terrestrial wildlife crossing roads, these Remnant Urban Bushland areas are vital as 'stepping stones' for flying fauna such as microbats, flying foxes and birds.

The larger the ecological corridor, the better it functions as a gene pool to local plant species as well as to wildlife.

The Bushland adjacent to CSR is in remarkably good condition and although it suffers from weeds in a couple of areas, they are small and would be easy to remove. There is very little Lantana and practically no other woody weeds. A quick plant survey conducted by local residents recorded 38 native plant species the corridor north of the CSR land east of Bellwood Street, plus only 5 weed species.

The retention of such areas is important to the core biodiversity of the City of Brisbane.

CDEA submits that a triangular portion at the northwest corner of Lot 3 of the CSR site be excised, revegetated and returned to Bushland thus making the adjoining ecological corridor wider and more sustainable. (Refer attached satellite image, marked up to show this issue.)

Stormwater and flooding impacts

A major proportion of the CSR site is proposed to be covered by the impermeable surfaces of tile storage areas, buildings and car parks. There is no evidence of any attention to Water Sensitive Urban Design (WSUD) principles. There is generally a problem in Centenary area of stormwater causing local flooding and erosion of waterways due to the increased amount of water flowing to the waterways from the impermeable surfaces of developments rather than being absorbed into the ground where it falls. This situation will be exacerbated by the proposed CSR development with more hard surfaces being drained to local waterways and ultimately to the Brisbane River.

CDEA submits that it would be more ecologically sustainable for the water to remain on site through the use of permeable surfaces or collection pits. Roof water should be collected in water tanks for reuse.

Heat island

Another negative impact of the large area covered by constructed materials is the creation of a heat island. The Centenary suburbs and area are already a heat island within Brisbane, this high proportion of site cover will increase the problem. With the generally acknowledged issue of climate change, this situation needs to be avoided. The proposed CSR development will exacerbate it.

CDEA submits that the issue of creating a heat island needs to be addressed.

Air pollution

The proposed concrete tile manufacturing plant will be large as it will be producing CSR's concrete roof tiles for the entire eastern seaboard area of Australia. A manufacturing plant of this type with its concomitant air pollution should not be located so close to a residential area. The current CSR roof tile plant already causes problems to residents in the area. The proposed extension will bring the manufacturing plant even closer to Sinnamon Park and exacerbate existing associated problems.

CDEA submits that issues of air pollution need to be addressed. If the problems of air pollution and bad odour are not resolved, and they have not been up to now, then the proposed manufacturing plant should not be located on this site.

Community impacts

Noise

The existing manufacturing plant already causes noise problems to Sinnamon Park, a combination of loudness and time-of-day, with noise often occurring early in the mornings or late at night.

The proposal is that the plant will operate 24 hours 7 days a week. It will also increase in size and production. The present operation has two 'stamping' machines, the proposed one will have five 'stamping' machines. It seems that these are the machines that cause the main distress to local residents.

The proposed increases in production and in extended operating hours can only worsen an already bad situation.

CDEA submits that issues of unwanted noise need to be addressed. If they cannot be, and they have not been up to now, then the proposed manufacturing plant should not be located on this site.

Vegetated buffer

The Western Gateway Local Plan requires a vegetated buffer along Bellwood Street. This is not apparent on the DA plans.

CDEA submits that a vegetated buffer strip should be provided. Acknowledging its proximity to bushland, this buffer strip should be planted with LOCAL native species.

Conflicts with City Plan 2000

The application conflicts with the Brisbane City Plan Western Gateway Local Plan for the Monier Road Precinct. This clearly encourages transitioning development in the area from Industrial to Residential.

Instead, this development will entrench a legacy industrial land-use for at least another generation, contrary to the intent of the local plan and in conflict with the residential expansion of recent years which has proceeded in line with the local plan and the planning strategies for the area.

Residents have moved to the area believing the CSR site would become residential in the near future. CDEA is led to believe that many residents were told this by the residential developers and real estate agents involved. If there was a clear understanding that the CSR land would remain industrial, most neighbouring residents would not have moved to this location.

CDEA submits that future development in this area conform with the intent of the local plan, in accordance with Brisbane City Plan 2000, that is, that it move from General Industrial to Residential use.

Conclusion

CDEA submits, for all the reasons noted above, that development application no. 948778 should be rejected.

Thank you for the opportunity of making this submission.
Yours sincerely,

Shealagh Savage
President
Centenary and District Environment Action Incorporated (CDEA)

CSR Monier site at Lots 3 - 6, Bellwood St, Darra



This satellite image has been marked up to illustrate the incursion of the north-west corner of the CSR site, creating a 'pinch point' for the neighbouring bushland reserve.

This incursion into the park impacts upon the continuity of the bushland corridor.

The green-shaded triangular portion should be excised for revegetation and inclusion as part of the bushland reserve.