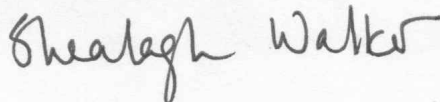




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Draft South East Queensland Regional Plan 2009 – 2031
Response by Centenary and District Environment Action Incorporated
30 April 2009

Response made by	Shealagh Walker	President
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Centenary and District Environment Action Incorporated 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 of Brisbane and the neighbouring areas.

Sections of the Draft SEQRP addressed in this submission.

GENERAL COMMENTS

PART D – Regional Policies

1. Sustainability and climate change
2. Natural environment
3. Regional landscape
4. Natural resources
5. Rural futures
6. Strong communities
8. Smart Growth
10. Infrastructure
11. Water management

PART E – Implementation and monitoring

Appendix 1 – Changes to the urban footprint boundary

GENERAL COMMENTS

Population projections

CDEA is of the strong opinion that the population should not be allowed to reach such a high number as 4.4 million as SEQ has neither the land nor the resources to accommodate so many people.

The figure of 4.4 million seems more of a target than a projection. This projected population will put enormous pressure on the natural resources of SEQ as well as on the already inadequate built infrastructure. The amenity will be destroyed and the 'liveable' lifestyle will diminish considerably. This number of people will destroy the SEQ that people love.

Carrying capacity

The carrying capacity of each regional area or catchment should be ascertained separately, as there are tremendous differences in resources and physical attributes across the region.

Contradictory

The Draft SEQ Regional Plan is contradictory as it claims to be protecting the natural assets of SEQ and at the same time promoting increasing its population so that it will be as big as Sydney by 2031, 4.4 million people. This is from the present situation where infrastructure is inadequate and where it will take a long time for it to be improved so that it can cope with the existing population.

There is no hierarchy or process to decide on conflicting demands or requirements of population growth and biodiversity. This needs to be provided.

Desired Regional Outcome targets

Each DRO should have a target to achieve and against which to be measured.

Information incomplete

Policies and information to inform the Draft SEQ Regional Plan are incomplete or not ready yet so it is premature to make final decisions on the plan.

Inadequate analysis and consideration time

The SEQ Regional Plan, when updated, will be the most important planning instrument in SEQ for the foreseeable future and the period to 2031. Time is of the essence for the natural values which are under threat and disappearing *now*. As the plan is expected to be accepted in July 2009 we fear there is not sufficient time to give all submissions the required attention and time to be properly analysed and considered.

Injurious affection

Queensland needs to be brought into line with the other Australian states and remove the law of injurious affection held in the IPA legislation. The expense incurred prevents acquisition of private land for public and environmental benefit.

Community consultation

While there is much more community consultation than previously, much of it is lip-service. At present, the community is informed when planning of a project has been completed, often when planning has taken a period of years.

The community consultation in the Integrated Planning Act requires a small advert in local newspapers and a notice on the boundary of the proposed development. This notice is often away from where people will see it in an undeveloped part of the area. The public is only given two to three weeks to put in submissions on a proposal that has taken months, probably years to plan.

Community consultation needs to be meaningful. The community needs to be consulted at the beginning of projects and given more time than the current two to three weeks to make submissions, bearing in mind that submissions are usually made during out of work hours with limited resources.

PART D – Regional policies

1. Sustainability and climate change

1.1.1 Sustainability

CDEA is of the firm opinion that the projected population of 4.4 million for SEQ is unsustainable with regard to resources, biodiversity, natural and built infrastructure and ecosystem services such as water.

1.2 Sustainability monitoring

It is vital that meaningful targets are set to measure the effectiveness of policies.

1.3 Reducing greenhouse emissions

It is vital that meaningful targets are set to measure the effectiveness of policies.

1.3.12

Retaining existing vegetation including regrowth

Although there has been a commendable flurry of tree planting by various organisations including BCC, it is much more carbon-sensible to retain existing vegetation which has more biomass and contains more carbon than removing trees and replacing them with tiny saplings of a greatly reduced biomass. The removal of existing trees adds to the carbon in the atmosphere.

Where bushland is classified as 'regrowth', and therefore has no statutory protection as Regional Ecosystem vegetation communities have, it is often decades old and has already locked up large volumes of carbon. Being relatively young, this bushland is better at neutralising carbon than old forests.

Planting trees

BCC has a program to plant 2 million trees which is excellent. However, all SEQ Councils should be required to have tree planting programs.

Local native plant species

To be ecologically sustainable, all trees planted should be of species local to the immediate area. Local native trees are adapted to local conditions of soil, nutrition and water and also support local wildlife. They support local character, important in these times of globalisation.

1.5 Climate change management

Climate Change Policy: Community Consultation

The policy on climate change is due to come out at the same time as the Draft SEQRP. Before it is accepted, it is important that it goes out to community consultation.

Heat islands

The problem of heat islands seems to have been overlooked by the Draft SEQRP. The heat caused by expansive areas of hard surfaces such as roofs and roads, even lawns, has a direct impact by increasing the ambient temperature around them. This needs to be addressed by retaining existing trees and shrubs, planting more in built up areas and creating 'green roofs'. These have many other advantages such as insulation and visual amenity.

2. Natural environment

2.1. Biodiversity

2.1.1 Biodiversity Policies

Biodiversity is only lightly covered in the Draft SEQRP which is surprising as Queensland is "home to 80% of Australia's native birds, 70% of its native mammals and just over half of its native reptiles and frogs." according to the Queensland Government's web site: [Toward Q2: Tomorrow's Queensland](#)

There is major conflict in the Draft SEQRP between achieving the inflated population prediction of 4.4 million people, which seems more like a target, while at the same time protecting SEQ's biodiversity, for which there are no targets.

Biodiversity in SEQ is being hard hit by burgeoning population growth and development. It needs to be taken very seriously and given strong protection by policies that are rigorously implemented and monitored. We feel the policies regarding biodiversities have not had sufficient consideration and are incomplete. They need to be formulated with extensive community consultation.

There need to be biodiversity targets, a monitoring system to track progress and policies to determine actions if targets are not met.

2.1.2 and 2.1.4 Development impacts

There are many excellent regulations in the Brisbane City Plan, however problems arise as they are often not implemented. There need to be ways of monitoring compliance with planning schemes.

The Integrated Planning Act needs to be revised as it is clearly pro-development and holds little regard for community consultation. Natural areas and biodiversity values are suffering as a result.

For comments on Injurious Affection please refer to general comments on page 2 of this document.

It is important to have meaningful buffer zones between natural areas and development areas to protect the natural area from negative impacts of development such as animal and plant pests, chemical contamination, stormwater runoff, noise, light, air pollution, human interference, dumping, vandalism and so on.

2.1.7 Offset programs and 2.1.8 Off-site revegetation

The offset conditions regarding both remnant vegetation and koala habitat are both seriously flawed. They favour development over critical biodiversity values.

CDEA supported the submission made by *Save Our Riverfront Bushland* on the Queensland Governmental Offsets Policy on 30 Nov 2007 and has already put in a submission on the Draft SEQ Koala State Planning regulatory provisions.

In essence, offsets give developers permission to destroy existing complex natural areas and vegetation with the promise to 'replace' them elsewhere or give money for the government to do this. Any offsets will take decades to establish and in the meantime wildlife will die without essential habitat.

In addition it is almost impossible to replace complex natural systems: any replacement vegetation can only be a simple version of the vegetation community it is supposed to be replacing.

2.1.3 and 2.1.9 Biodiversity network

Regional biodiversity corridors

Interconnection of natural areas is of paramount importance to the continuing existence of Queensland's rich biodiversity. There needs to be a government policy on restoring, creating and maintaining ecological corridors at all the various levels of biodiversity.

Map 5: Significant biodiversity areas shows how fragmented these areas are. This map needs to show existing and proposed ecological corridors on it as well.

In fact, for a sustainable environment, it is essential to have a regional biodiversity infrastructure: this could be based on waterways, mountain ridges and existing significant natural areas.

2.1.9 is a start in as much as it recommends identifying regional biodiversity corridors. However, it needs to go much further and actually designate and implement a regional biodiversity infrastructure.

There was a move over recent years to have a green corridor from Mount Flinders in Ipswich City to Karawatha in Brisbane. This was laudable but unfortunately the corridor has been eaten away by various developments which should never have been allowed by the authorities.

There needs to be stricter enforcement of the retention of ecological corridors so that this does not happen in the future. If they were mapped this would help everyone concerned.

It is clear from the fact that major roads and railway lines are shown on Map 5: Significant biodiversity areas that they are important to SEQ. However, they are very disruptive to ecological corridors. There needs to be clear policy on designing transport infrastructure to accommodate significant biodiversity areas and ecological corridors. This would include locating transport corridors so that they do not cut up significant biodiversity areas.

They could do this by circumventing important biodiversity areas and constructing regular strategically placed fauna crossings. There are several in Brisbane that have been very successful, ranging in size from wildlife culverts to comprehensive wildlife movement bridges such as at Compton Road.

Just as there is a proposed network of roads and other built infrastructure, there need to be networks both of natural areas and of public open space. This would be both to support biological diversity and to provide outdoor recreation spaces for a growing population that is becoming increasingly aware of fitness and health and is spending time outdoors pursuing these.

Regional biodiversity strategic areas

Although the Queensland government's aim in Toward Q2: Tomorrow's Queensland is to protect 50 percent more land for nature conservation by 2020 (DSEQRP p43), a higher percentage is required in SEQ which only has "19% of public open space compared with 49% for the Greater Sydney region." (Web site: Toward Q2: Tomorrow's Queensland)

A large proportion of Brisbane's Public open space is locked up in Brisbane Forest Park so that the proportion of open space in Brisbane city itself is actually much lower than 19%.

In order to maintain biodiversity within urban areas of Brisbane, more land needs to be set aside to preserve biodiversity values.

The proposed increase in population for SEQ will put additional pressure on existing natural areas and biodiversity values will be further compromised. As it is, people are spending more time outdoors maintaining fitness and are using existing natural areas even more. Additional areas need to be set aside for recreation to avoid further damage to existing natural areas.

There needs to be a clear differentiation made between the SEQRP's 50% more land proposed to be set aside for conservation purposes and the 50% more land proposed to be set aside for recreational purposes. Recreation has a completely different set of needs and, more often than not, impacts negatively on conservation areas.

Public education on regional biodiversity

The general public needs to be educated in the importance of retaining urban bushland areas and of biodiversity in general.

2.2 Koala conservation

CDEA has already submitted a detailed submission on the Draft SEQ Koala State planning regulatory provisions. It comprises three documents:

1. Submission on the Draft SEQ Koala State planning regulatory provisions dated 27 February 2009;
2. KOALA USE AREAS IN THE CENTENARY SUBURBS dated 27 February 2009 – a table of the areas CDEA proposes that need to be included in Map SEQKH5 as Koala Habitat Protection Areas;
3. 154 Horizon Drive, Westlake – Survey of trees with Koala markings, dated 25 June 2006 (as one specific case study example).

Kangaroo and other wildlife conservation

Kangaroos and wallabies are also being heavily impacted by development and population growth, as is all wild life. There need to be conservation plans for these before they get to crisis point. Kangaroos and wallabies, being large terrestrial mammals, are particularly negatively affected as they share the same plane of activity as people.

All wildlife depends on connected bushland areas, one of the reasons why a biodiversity infrastructure network is so important. This is referred to elsewhere in this submission.

3. Regional landscape

To repeat what we have written under Section 2: there needs to be a clear differentiation made between the proposed 50% more land proposed to be set aside for conservation purposes and the 50% more land proposed to be set aside for recreation. Recreation has a completely different set of needs and, more often than not, impacts negatively on conservation areas. Additionally, both areas are required for their individual purposes.

3.2. Regional landscape management areas

3.2.1 Regional landscape corridors

Please refer to comments under **2.1.9 Biodiversity network** above.

3.2.2 Inter-urban breaks

These are vital to regional planning for many reasons as stated in 3.2.2 of the SEQRP document. CDEA agrees these breaks are very important.

An opportunity to maintain an inter-urban break exists on the State-owned land at Wacol and abutting natural areas in the south west of Brisbane. In August 2006 the then Premier, Peter Beattie, promised 200ha would be set aside for the community to use for public open space and recreation¹. This land connects to the east to Pooh Corner and BCC bushland north of Centenary Village and east to the Brisbane River corridor. [See attached Google earth aerial photo.](#)

Besides the corridor's very valuable biodiversity and recreational values, it would also provide an important inter-urban break and 'breathing space' within the fast-developing western corridor from Brisbane to Ipswich.

This inter-urban break in the Wacol area needs to be removed from the SEQ urban footprint.

Furthermore, there is a biodiversity linkage evident southwards from the Wacol lands identified above. This runs from the Brisbane River riparian corridor in the north (at Wacol), along the Bullockhead Creek and Sandy Creek tributaries of the Wolston Creek catchment in Richlands and beyond, upstream to the *Greenbank Military Training Area* in the south, an area with significant biodiversity values.

We understand that these linkages are recognised by Brisbane City Council's *Core Biodiversity Network (CBN)* to be incorporated in a future revision to the Brisbane City Plan.

The Wacol lands also link to the Woogaroo Creek catchment and south to Ipswich City Council's *White Rock – Spring Mountain Conservation Estate*.

Both the *Greenbank Military Training Area* and the *White Rock – Spring Mountain Conservation Estate* are key parts of the *Flinders Peak – Greenbank – Karawatha biodiversity corridor (FPGKBC)*.

The Wacol-Richlands inter-urban break, therefore, would provide a northward arm of biodiversity linkage from the FPGKBC to the Brisbane River riparian corridor at Wacol, as well as providing the breathing space at the Brisbane-Ipswich interface of the western growth corridor.

¹ <http://www.cabinet.qld.gov.au/MMS/StatementDisplaySingle.aspx?id=47555>

Adoption of such an inter-urban break within the so-called western growth corridor would remove the inconsistency between this corridor and the SEQ region's northern and southern coastal corridors. For both those coastal corridors, inter-urban breaks have been identified (and rightly so) since the inception of the first SEQ Regional Plan.

A 'western growth corridor' without an inter-urban break is simply 'urban sprawl' under another, sanitised name.

3.6 Regional open space network

CDEA supports mapping of a regional open space network. Map 8: Regional open space network only shows open space areas such as national parks, it does not show a network of open space or even a proposed network to work towards.

There is the beginning of a walking network. This needs to be fast-forwarded to keep up with the population's demand for outdoor exercise and recreational activity areas.

There is a dearth of trails near the main urban areas and this needs to be addressed with acquisition of open space and construction of trails.

Trails need to be provided for pedestrians, cyclists, mountain bikers, horse-riders and trail bikers. These trails also need ongoing maintenance.

Water trails need to be developed as well and waterways looked after.

Just as there is a proposed network of roads and other built infrastructure, there need to be networks both of natural areas and of regional recreational open space. These would both be to support biological diversity and to provide outdoor recreation spaces for a growing population that is becoming increasingly aware of fitness and health and is spending time outdoors pursuing these.

Once again, there needs to be a clear differentiation made between the SEQRP 50% more land proposed to be set aside for conservation purposes and the 50% more land proposed to be set aside for recreational purposes. Recreation has a completely different set of needs and, more often than not, impacts negatively on conservation areas.

Urban open space needs to connect to regional open space to make it more viable both ecologically and recreationally.

4. Natural resources

4.2.4. Retaining existing vegetation including regrowth

Refer to 1.5 Climate change management on page 2 of this submission.

The system of Regional Ecosystems is excellent. However, there are many areas of complex regrowth vegetation which slip through the cracks and are not protected. Many of these areas have equally high biodiversity values as RE areas and are important to wildlife. There needs to be a policy that protects these areas of regrowth vegetation as well.

SEQ Forests Agreement

This plans to phase out harvesting of native forests by 2024. This needs to be fast-tracked and the harvesting stopped immediately. Queensland's native forests have much more valuable assets than raw timber: ecosystem services, carbon retention, scenic amenity, general amenity, wildlife habitat, recreation, tourism to mention some of them. The native forests need to be protected as they are a finite and very valuable resource to SEQ and Australia in general.

4.3 Ecosystem services

Ecosystem services have long been ignored and have only started to be recognised and appreciated because of the ongoing drought in SEQ. They are only lightly covered in the Draft SEQRP and deserve much more consideration.

There need to be more education programs on the impacts caused by humans on air, water, climate change, flooding, drought, forests, natural areas and wildlife. Too many people take these for granted and immeasurable harm is being done that may not be reparable.

4.3.3 Agriculture

Agriculture is one of the major causes of destruction of ecosystem services. Damage is caused by vegetation clearing and habitat destruction, salination, climate change caused by forest clearing, drying up of rivers by irrigation demands, soil erosion, weed invasion, animal pest proliferation and fertiliser contamination of waterways. There are other damages as well.

As such, these impacts need to be acknowledged and mitigated.

5. Rural futures

5.2 Agriculture has huge impacts on the environment; see notes under *4.3 Ecosystem services* above.

More emphasis needs to be put on organic farming and a strong move made away from the use of pesticides, herbicides, antibiotics, hormones and artificial fertilisers. All of these damage the environment and often cause health problems to people.

Genetically modified crops must not be grown as their impacts are unknown and their benefits dubious.

6. Strong communities

6.4.1 Community consultation

See comments on page 2 of this document.

6.4.2 Local character

Local native plant species

Local native tree species support local character, important in these times of globalisation. They are adapted to local conditions of soil, nutrition and water and also support local wildlife. (Refer to page 3 of this document.)

6.4.3 Adequate provision of public spaces

There is a tendency to use existing urban open spaces for increasing housing and built infrastructure. This often means that as population density goes up, the amount of open space goes down. It is vital that there is adequate open space provided for all people, especially those living in high density areas. This is important in both existing and new urban areas, including business areas such as CBDs.

Community health has deteriorated by lack of exercise in the past. People need pleasant open spaces for exercise and to allow relaxation from work and city living. It is well recognised that mental and emotional health is as important as physical health. Urban bushland is especially valuable in providing an escape from the stresses of everyday life and should be vigorously protected.

8. Smart Growth

8.2. Compact development

Carrying capacity

There need to be formulae to define the population carrying capacities for differing areas of SEQ. These need to include a standard for the provision for public open space.

8.2.5

The blanket requirement of a minimum dwelling yield of 15 dwellings per hectare net for new residential development in urban growth areas does not take into account the specific

qualities and attributes of differing areas. There need to be standards to accommodate regional differences.

Protection of urban bushland

Refer to comments above in 6.4.3.

While we agree with the idea of compact development, there must be protection of existing urban bushland areas and adequate provision of recreational open space for local inhabitants.

10. Infrastructure

Open space infrastructures

As well as built infrastructure such as rail and energy, it is vital that there are both a regional biodiversity infrastructure network and a regional recreational infrastructure network for SEQ.

These could be developed from *Map 5: Significant biodiversity areas* and *Map 8: Regional open space network*. Both maps show fragmented natural areas. These need to be developed into separate meaningful biodiversity area and recreational area infrastructure networks. These could overlap in places as long as biodiversity is not compromised by inappropriate activities.

Refer to comments in 2.1.3 and 2.1.9 *Biodiversity network, Regional biodiversity corridors* on page 4 of this document.

Beaches and sea

The beaches and sea areas of SEQ need to be included in the biodiversity and recreational infrastructures. They are one of the main reasons why many people migrate to Queensland and consequently come under a great deal of population pressure. They are a delicate and finite resource and need to be properly managed and protected.

11. Water management

11.2 Waterway health

Waterway health has long been ignored or neglected in SEQ and the waterways have struggled through contamination, over-harvesting, being piped and canalised and having development placed either over them or much too close to allow natural functioning.

Waterway health is pivotal to a healthy environment and much more needs to be done to ensure that SEQ's waterways become healthy again. Their health affects not only the natural environment but all aspects of human activity such as industry, agriculture and recreation.

PART E – Implementation and monitoring

It is all very well to have a regional plan for SEQ, and monitoring its progress and effectiveness, but there needs to be implementation of the plan and this needs to be transparent and accountable. For example, Brisbane City Plan has many good aspects but they often are not implemented due to lack of funding or political will. This must not happen to the SEQ Regional Plan

Appendix 1 – Changes to the urban footprint boundary

We request the following removals from the urban footprint.

1. Koala land in Centenary suburbs area of Brisbane

On 27 February 2009, CDEA submitted a detailed list of land that we have requested be classified as interim koala habitat protection areas. We further request that these lands be removed from the urban footprint to ensure their ongoing availability to koalas.

2. Wacol / Pooh Corner / Richlands inter-urban break

In August 2006 the then Premier, Peter Beattie, promised 200 ha would be set aside for the community to use for public open space and recreation. (Refer 3.2.2 and footnote 1 on page 6 of this submission.) This connects to the east to Pooh Corner and BCC bushland north of Centenary Village, west to the Brisbane River corridor and southwards to Richlands and beyond. See attached Google earth aerial photo.

The Wacol – Richlands area also links, via riparian corridors as outlined on page 7 above, to the Flinders Peak – Greenbank – Karawatha biodiversity corridor.

Besides the Wacol – Richlands corridor's very valuable biodiversity and recreational values, it would also provide an important inter-urban break and 'breathing space' within the fast-developing western corridor from Brisbane to Ipswich.

In addition, this land is habitat to Brisbane's only mob of urban kangaroos, being approximately 1300 in number. Preserving this inter-urban break and biodiversity corridor will mean the survival of these kangaroos who are important to the region's biodiversity values, to the Brisbane community and to ecotourism.

End of submission.