

# Nathan, Salisbury, Moorooka Neighbourhood Plan draft strategy

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- Emailing the team ([neighbourhood\\_planning@brisbane.qld.gov.au](mailto:neighbourhood_planning@brisbane.qld.gov.au))

## Summary

### **Additional Theme: Definitions, Drivers & Stakeholders**

#### Definitions

“*Economic prosperity*” as growth can mean quantitative or qualitative increases, or both. “*Great places to live*” as quality of life requires a limit to quantitative increases to avoid crowding, loss of green space, poverty and all the negative flow-on effects.

#### Drivers

City Council has initiated the Plan, but developers are co-instigators. The former seeks to serve the community and be re-elected. Developers seek to serve the community and reap financial rewards. The state and federal governments are regulators of factors impacting the Plan, including population, etc.. They seek to serve and get re-elected and are upstream instigators. Large companies want changes that expedite their operations and increase their customer base. Small businesses have similar wishes but upper limits and like residents are closest to the lived reality of the space. Both seek improved amenity and services, not disruptive changes. They are usually reactive to changes rather than initiators. Speculative property investors are more or less reactive and motivated by service provision, rental income and capital gain.

#### Stakeholders

The primary stakeholders are people who live, work, play, commute and transport goods in the area. Governments protect their voter base. Developers come and go. Property investors can be home owners and households who care about amenity and stability as opposed to speculators seeking profit.

### **Theme one: Places for everyone**

A high-concentration option over train stations (like Toowong Tower) solves many issues. No grassroots call for increased population. Existing spectrum of housing choices sufficient for aging society. 2019 community feedback calls for retention of character housing, not increased density.

### **Theme two: Local industries and employment**

Neighborhood and Industrial Plans be better coordinated by ward reps. ‘Clean’ industries needs to be defined. Industrial zone to be more co-reliant precincts. Heavy industry relocated further south. Light industrial/commercial zones to incorporate residences to reboot manufacturing.

### **Theme three: A grid of green and blue**

Prevent nature reserve conversion to recreational, lifestyle (cycle & exercise paths) areas. Connect Toohey Forest with green waterway corridors to Oxley Creek. More parks and community facilities to prevent crime and social breakdown.

### **Theme four: Connecting places and spaces**

Tower complexes enclosing train stations for cover and noise reduction; incorporate Ipswich Rd and Lillian Ave flyovers. More cycle paths good, if they don't encroach on nature reserves. Transport infrastructure for projected demand inadequate. Inland Rail ending at Acacia Ridge huge impact, uncertain; needs a contingency planning for heavy freight; tunnels. Toohey Road tunnel under forest. Relocate heavy industry and MCV to Acacia Ridge.

**Note:** This submission is supplementary to the feedback I sent via Council's online survey previously and as such takes precedence over it.

## **Introduction**

I live in a quiet part of neighbouring Coopers Plains. I frequently visit friends in Salisbury and Annerley and cycle to Rocklea shops. I use all modes of transport at different times. Although the draft strategy has some laudable goals, I am concerned about its scale, its underlying assumptions and some of its rather derivative characteristics. To correct these short-comings, I propose adding a theme to the draft strategy to define growth and development, drivers and stakeholders, their motives and their roles. Also, if the community genuinely supports increased density, I propose building tower complexes over Moorooka and Salisbury railway stations along the lines of Toowong and Central stations, only bigger, rather than a spread of medium to high density apartment blocks. Without these modifications, the City Council risks being at cross-purposes with the community and negatively impacting on the amenity, safety, character and community spirit of the area I enjoy so much.

### **Additional Theme: Definitions, Drivers & Stakeholders (see Appendix 1)**

This missing Theme will help clarify who is who, what their role is in the draft strategy and what their motivations are. It is crucial to a cohesive dialogue. It will facilitate the formation of a social contract of what each players' role is and should be. It will also achieve a better balance of community and government/business input. Residents and businesses of metropolitan suburbs are blameless in their apathy with regards to planning, as are local governments for their usual top-down approach in their attempt to plan in light of this apparent apathy. In order to strike a better balance, I suggest Council's Ward representatives act as catalysts for a more ground-up consultation process, as they are more familiar with people and issues in the area whose on-going concerns and ideas need only be facilitated. They could also assist in better coordinating residential, transport and industrial plans.

### **Theme one: Places for everyone**

*“Brisbane’s population is both growing and ageing, so a range of different housing types will be needed in the future.”*

The draft strategy does not ask residents if they want an increase in population. Feedback in late 2019, according to the Draft Strategy June Report does not include a call for more people (page 5). All the questions in the current online feedback survey simply assume our acquiescence. Many objections to the Plan imply opposition to a bigger population. Proper planning requires some projection of numbers of new residents. This hasn't been provided, nor any upper limit.

Aging is a normal demographic shift that is temporary and easily accommodated by a rich and developed country like Australia. Most people want to age in place at home, in the community like my 92 year mother did until her death in 2017. Alterations to their homes and services such as Blue Care are cost effective compared to the wholesale redevelopment of a suburb. What is to be celebrated is that we are living healthier towards the end of our lives and therefore more able to live independently. Some expansion of facilities for aged care are needed, but if the population increases through immigration, demographic aging will simply be delayed because newcomers age, too.

The draft strategy states *“Housing tends to be single detached dwellings with three or more bedrooms with isolated pockets of units and duplexes. Without a spectrum of housing choice, residents will find it harder to find a home of the right size as their requirements change over time. People who want to stay in this area may find it unaffordable without a supply of a range of*

*dwelling*.” Existing detached dwellings, units and duplexes ARE a spectrum of housing choice. There has been considerable diversification and expansion of accommodation since 2000 to cater for large numbers of international students attending Griffith University. If the number of temporary overseas visitors after COVID is reasonable, there should be adequate supply for new residents. Also, it is reported that a considerable stock of accommodation belonging to foreign speculators is standing empty across the city. People who want to stay in the area WILL find it unaffordable if the population grows, as witnessed nationwide in the last 2 decades, despite a massive increase in supply.

If the current domestic population influx continues and the international intake remains minimal, an expansion of accommodation might be followed eventually by a contraction. Flexible, prudent goals, design and construction should keep this in mind. In terms of planetary limits, we need human population to contract its consumption patterns and its numbers, because they have real, local effects. For the sake of efficiency, I suggest a tower complex directly over Moorooka and Salisbury stations, such as exists in Toowong to increase accommodation capacity in place of the spread of 3-5 story apartments across the suburbs for a number of reasons. A range of spacious family apartments and studios, offices, communal facilities, retail and government services (such as another library) and limited parking would genuinely broaden the spectrum of housing available. Towers at both stations would offer great views of the suburb on the east side and of the adjacent green spaces to the west. But towers must **substitute** a swathe of medium density, not **accompany** them: “*Maintain the family aspect of the suburb. Minimise vehicle movement as there is a number of children that walk to school on this street and the tree shade that is provided.*” (Comment by Matt pinpointed on interactive map.) A tower development at each station would prevent many flow-on alterations that would be needed and help retain back yards and the healthy lifestyle Australians value, which is what is attracting people to the area.

The 2019 feedback does not support the spread of high rises proposed in the draft strategy. It supports “*retaining character buildings*”. If proposed zoning proceeds, many character buildings will be lost because they are dotted all over the suburbs and most of the oldest buildings are, quite naturally, close to long-standing transport routes. For example, at the Salisbury station end of Henson Street there are 6 properties identified as character buildings and pinpointed on the interactive map, as are several on Regis St and Humber St. These are just a few of the character buildings in 3-5 story zones. Even if all character homes were protected, rebuilding many sites into multi-story flats will waste millions of dollars invested by existing and new residents in renovations and splitter developments. Zoning for a swathe of high-rises that retains character and heritage homes will prove to be a nightmare for planners. A much greater concentration with a smaller footprint is the only way to avoid this.

The draft strategy introduction states, “*Aboriginal groups used the land in this region as camping grounds and for traditional sacred rite ceremonies*”. Aboriginal people have lost their place, yet they are still here. If we are sincere about there being “Places for everyone”, let us consult with them and include their needs and heritage in the Plan. Dr Ray Kerkhove’s research ‘Aboriginal Campsites of Greater Brisbane’ (2015) identifies a campsite at the head of Rocky Waterholes creek near the southern end of Lophostemon Track (Toohey Forest) and a sacred rock at the intersection of Muriel Avenue and Ipswich Road.

## **Theme two: Local industries and employment**

The draft strategy proposes increased building heights and mixing commercial, ‘clean’ industries and residential buildings up to eight storeys alongside transport routes with little thought to traffic

and pedestrian movement. 'Clean' is mentioned once in the report and not defined. The 'Reimagining' of Moorooka's Magic Mile is derivative at best. To support the implementation of drafts strategies 2.1 to 2.4, commercial (as opposed to retail) and industrial zones should be partitioned from residential areas into precincts. For example, in the industrial pocket north of Moorooka Station and west of Ipswich Road, a back road along Moolabin Creek would reduce traffic on Ipswich Road if those businesses were to any extent co-reliant. Council could facilitate this in the long term.

It is in the interests of good planning that business owners and residents collaborate on a neighbourhood plan. Whilst it makes some sense for Council to separate them, this Neighbourhood Plan and the recently released 'Our Productive City, Brisbane Industrial Future' report should be better **coordinated** by its ward representatives. The Suburban Alliance sponsored Salisbury Reloaded and Reimagined reports in the industrial areas north of Evans Road provide an example of where residential and industrial collaboration could bear fruit for Australia's post-COVID rebooting of its manufacturing base. With the retention of the heritage "saw-tooth" workshops from World War II, this would increase housing supply whilst also a fantastic opportunity for high-quality urban development that brings work place and home closer, reducing commuting and increasing a sense of community.

With respect to the South West Industrial Gateway, industrial demand in the Salisbury area is low with many long-term vacancies, derelict/abandoned buildings. In line with a comprehensive "heavy vehicle management plan" for the area, it would be best to restrict warehousing requiring container-size trucks and Multi-Combination Vehicle (MCV) access to other areas in Archerfield, Acacia Ridge, Pallara and Darra that are on State-Controlled Roads with dedicated MCV access routes. Heavy industry zoning in Salisbury and Moorooka should be restricted and instead the area set aside for a combination of light commercial/community use interspersed with medium/high density residential zoning.

### **Theme three: A grid of green and blue**

Whilst all the strategies in this section are laudable, they are undermined by the premise of the Plan; excessive population growth. A coexistence of humans and native fauna and flora habitat is difficult, but not impossible. Priority must be placed on preserving and even extending natural areas for native fauna and flora, not transforming them all into parks and recreational playgrounds. Brisbane City's 'green corridors' that are supposed to be developing into a connection of waterways to bush land are still isolated from one another. The bush lands are shrinking. They need to be connected if we are to see the return of iconic animals such as the glider species in Toohey Forest that have diminished or disappeared. (page 117 - "Catterall, C.P. & Wallace, C.J. (eds) 1987. An Island in Suburbia: the Natural and Social History of Toohey Forest. IAER Griffith University, Brisbane.) Toohey Forest's isolation could be remediated by connecting it to Wilcox Forest and Salisbury Recreation Reserve, creating a wildlife corridor along Rocky Water Holes Creek and out to Oxley Creek and Brisbane River. There is potential for a similar connection on the north west side of the Forest to Moolabin Creek. A long-term plan is needed to achieve this.

There are no new parks included in the draft strategy. With an increase in population, public amenities will be in greater demand. Sports and recreation fields and community garden space should be identified and created without encroaching on natural environment zones to avoid an increase in crime rates and social problems. Residents have long been calling for the renovation of Moorooka Bowls Club. A tower complex at Moorooka station would have a beautiful vista over the

Brisbane Golf Club. The creation of parks either side of the complex within walking distance should be prioritised.

#### **Theme four: Connecting places and spaces**

The expansion of cycle and pedestrian paths in the draft strategy is encouraging. However, the impact of some of these on natural areas needs further study (OCCA, July 2021). Many proposed bike/walk ways were supposed to be delivered 20 years ago in the Moorooka District Local Plan from City Plan 2000 (Chapter 4, p. 108), but weren't "...and now the promises have been recycled in the new plan. What guarantee do we have that any of the stuff in the first 24 pages of the draft plan will eventuate? Seems like the only thing guaranteed is the up-zoning of our residential and character lots to medium density. If they didn't deliver last time it's entirely possible they won't deliver this time." (Patricia Keilar, Save Our Salisbury Action Group, FB, 7<sup>th</sup> July 12:30am.)

*"...the Australian Government is currently progressing the Inland Rail connection between the Acacia Ridge Intermodal Terminal and the Port of Brisbane."* This situation is currently under review and studies suggest that a Toowoomba to Gladstone by-pass of Brisbane is more cost effective. A bypass would avoid enormous disruption and congestion along the Brisbane Urban Corridor. The draft strategy should not assume Inland Rail will get to the Port of Brisbane, but should be prepared for it as a contingency. For example, a heavy vehicle management plan is required to take containerised road freight off Ipswich Road, Moorooka to Annerley and off the Brisbane Urban Corridor (BUC). Inland Rail to Acacia Ridge will triple the number of trucks unloading onto these roads locally by 2040.

The most egregious short-coming of the draft strategy that most people are bemoaning is its lack of adequate transport infrastructure to support the proposed increase in and spread of density. *"Council will continue to work with the Queensland Government to improve access for all users and make it easier to transfer between modes of transport."* The Pacific Motorway is already jammed at peak hour. Therefore, given that *"Brisbane Metro and Cross River Rail will significantly improve public transport options"* it makes sense to make the most of the train stations. Multi-story residential and retail tower complexes over Moorooka and Salisbury stations will increase use of rail transport and limit disruption to the rest of the suburb. Railway stations do not need to be open-air. In fact, enclosed by a building they are sheltered from the elements and their noise is dampened. As both stations are on state own land, a tower complex would generate much-needed revenue to help pay down Queensland's \$80B+ debt. They should also be able to incorporate access over Ipswich Road and at Lillian Avenue, over the railway line. Where subdivisions and high-rises are spread out, the range and number of road modifications necessary to keep them safe rises dramatically. Frequent local bus services from the tower complexes around the suburbs and back would again minimize traffic congestion and parking. Redlands Council is currently trialing driverless electric buses for a similar purpose. Moorooka Station is in close proximity to the Rocklea Markets; the pedestrian & cycle path envisaged in the draft strategy should connect these points and Rocklea Station. It is extremely problematic not to fully integrate these significant neighbouring transit and commercial features.

The draft strategy is missing a number of key transport proposals the community has been calling for, for some time. They are not cheap, but would significantly increase the value and amenity of the area. The intersection of Annerley and Ipswich Rd shopping strip has become unworkable as an arterial route and as such a tunnel has been suggested. The severing of Toohy Forest into two by Toohy Road has devastated its wildlife and continues to do so. A tunnel there would restore its integrity as a natural environment and expedite traffic flow.

## Conclusion

My proposals are offered to support a stable, healthy society where the range of aspirations between developers and politicians on the one hand and residents, businesses and workers on the other are accommodated in a feasible compromise. Whilst local councils have little influence on national population policy, they can send out a message that an unreasonable, unplanned increase (with no end point) that has been imposed, rather than voted on, will not be catered for. It is high-time population policy became a topic of public debate. Ill-conceived growth will hamper our resilience to climate change, pandemics, energy constraints and economic challenges whilst bequeathing a more unaffordable economy and damaged environment to future generations. Local government needs to take a greater role in controlling development and shape it in the interests of the public. To the extent to which population increase is going to be accommodated, my proposal is for a better, moderately bigger neighbourhood. There is no question we have the engineering ability to build tower complexes over stations, but do we have the imagination to see them as a **substitute** for a swathe of medium density zones? I understand the State Government did studies and found the market appetite does not exist for building over railway lines and stations and is only 'viable at high densities.' Given the almost universal belief that population growth is unstoppable, how likely is a tower complex in a much sort-after location going to end up as a white elephant project if it's the **only** new stock on the market? If it's done well, it'll appeal. Why lure an influx of people that steadily transforms the area from what originally attracted them into something that's looks like everywhere else, and *then* build over the station? Do it the other way around. At worst, it'll allow more time for the community to decide if they want to go further with development and if they do, medium density could be done more cleverly. Elected officials are obligated to act in the interests of their constituents; the interests of those who wish to move into the area are secondary. Developers have no place at the table until they are needed, and then only to advise. There has been no disclosure of the land ownership of large parcels by major developers and lobby groups. This is required to ensure any conflict of interest can be known and the capital gain from the sale of relevant properties is fully recouped by government. Suburban Alliance, a key developer group, has had undue input from the earliest stages of this draft strategy and holds 'open invitation' meetings that exclude the people most affected by their schemes. For example, I was invited to a breakfast with the Lord Mayor of Ipswich to discuss that city's response to an expected growth spurt post-covid and the tickets were \$85, the location was BRISBANE CBD and the time was 7AM. The Port of Brisbane Corporation, who is advocating for the Inland Rail project to terminate at the Acacia Ridge is represented in Suburban Alliance. To date, all the evidence is that calls for all the quantitative (as opposed to qualitative) changes embodied in the draft strategy are not coming from the local community, but developers and politicians dedicated to quantitative growth. My proposal strikes a middle ground that makes the most of existing infrastructure, invests in improving the neighbourhood's livability and natural environment.

I conducted a very simple poll on 4 different Facebook community groups in all three suburbs, asking for opinions on the idea of a tower complex of apartments and shops over the two stations as a substitute for the spread of medium density. The question and response options were narrowly focussed on the increase, spread and location of density. Responses in Moorooka (129) suggest my proposal has some support. The results are not reliable for a number of reasons and the poll was not sophisticated enough for interpretation of any further detail.

Thank you for the opportunity to comment on the draft strategy. I sincerely hope that its next iteration is substantially improved, as a result of this consultation process.

Simon Cole  
Bachelor Behavioural Science, Ass Dip Community Admin., Grad Dip Ed., Master of Science  
Education.  
148 Nyleta Street,  
Coopers Plains  
4108  
saimoncole@gmail.com



## Appendix A

### Additional Theme: Definitions, Drivers & Stakeholders

#### Definitions

*“Council undertakes neighbourhood planning to ensure our local areas are great places to live, facilitate economic prosperity and provide the range of infrastructure and facilities required by the community.”* ‘Economic prosperity’ is often equated with growth. However, growth can mean quantitative or qualitative increases, or both. ‘Great places to live’ or quality of life generally requires a limit to quantitative increases to avoid crowding, loss of green space, poverty and all the negative flow-on effects.

#### Drivers

Who are the Actors in this Plan? On the face of it, the city Council has initiated it. However, as can be seen in the Salisbury Reloaded and Reimagined reports sponsored by Suburban Alliance, developers are very much co-instigators. What are their motives given that the individuals in these organizations may or may not live in the area? Naturally, local politicians seek to serve the community and be re-elected, at the very least. Developers seek to serve the community and reap financial rewards. The state and federal governments are also Actors as regulators of a wide range of factors impacting the Plan, including among other things transportation, education, health services and population. Again, they seek to serve the public and get re-elected, at the very least and are upstream instigators to which Council responds. Large companies who do business in the area want changes that better expedite their operations and increase their customer base, as growth in numbers and profits is a key motivator. I can only speculate as to their role as instigators. Small businesses have similar wishes, but often have upper limits to their expansion ambitions. They are pretty much on the same level as residents; on the ground, close to the lived reality of the area and the most invested in changes to it. Both small businesses and residents generally seek improved amenity and services rather than disruptive, large-scale alterations. As a disparate, numerous population, they are usually reactive to changes rather than initiators. Speculative property investors not necessarily resident in the area are similarly reactive unless represented by professional organizations and are motivated to provide a service (accommodation) and reap rental income and capital gain.

#### Stakeholders

The primary stakeholders in the Plan are the people who live, work, play, commute and transport goods in the area. Governments at all levels have a localized, vested interest in maximizing their voter base. Developers are least invested in the area as the record show they maintain little connection to their service once their job is done. Property investors exist on a spectrum of meaning from physical, social and community needs to purely financial. At one end, home owners and shopkeepers care about amenity and stability. At the other, property speculators encourage anything that improves the financial return on their investment.