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18 August 2023

Hon. Steven Miles Minister, State Development PO Box 15009 City East, QLD 4002

RE: STATE GOVERNMENT'S SOUTH EAST QUEENSLAND REGIONAL PLAN 2023 UPDATE

Dear Minister,

I write to address and submit our consideration of the State Government's *South East Queensland Regional Plan 2023 Update* (SEQRP). The *Southern Brisbane Suburban Forum* Inc. is a local volunteer organization that has been formed to give a democratic voice to the local community. The forum creates the opportunity for a collective discussion and narrative for local stakeholders to drive to desired changes to their suburbs. Geographically, our southern Brisbane suburbs have a critical role in Brisbane City's future and has diverse assets to be enhanced and nurtured with sub-city regional strategic planning – driven by community, with others such as governments, business and other organisations. The Forum sees the coming together of people from diverse business and community interests to show a cooperative way to create and inform change in partnership with different decision makers.

National Parks (Maps 3, 26) has historically been thin on the South East Queensland landscape. The key message of the South East Queensland's urban sociology is the history of the totalising urban sprawl on top of the environment history in massive land clearance for the early stages of rural industries (1842-1925). The two years in the parenthesis relates to the first development of Brisbane township (1842) to the formation of the Greater Brisbane Council (1925). This is the very reason why National Parks (Map 3) has historically been thin on the South East Queensland landscape, and the strips of agriculture land, in Map 26, is all that is left from the urban sprawl. The problem of contemporary city and regional planning is that it is in *the forgetfulness*, *or perhaps isolation-thinking*, to the big-picture trends of urban histories and in critical local studies. In other words, there is very poor ecological thinking, not merely as to "the natural" environment, but sufficient thinking to "the human" environment" which is 100% in 'the natural' thought paradigm.

The SEQ 2046 vision (Map 4) misses the whole critical question of sustainable suburban living, and ecological sustainability; the sustainable, which is very much about the details of new suburban developments and types of housing put into place. The Government has highlighted sustainability of koala habitats (Map 16); however, the presentation of the planning does not shows how that sustainability has capacity when urban footprints expand into koala habitats (Table 14-Map 15 Biodiversity). The principles outlined is noble but there belied the intended applications by future governments and councils. There are no clear measures of the preservations to be made, in each specific landscape on ecological evidence. Areas are identified for concern, but there are no clear operational pathways. This truth not only pertains to koala habitats but all of the other ecological issues connected to sustainable suburban living. Map 15 illustrates the noble intentions, without the evidence that the regional biodiversity corridors will not be thinned out further in coming years. The Government is to be commended for the concept of 'Inter-urban breaks' and the Forum would be supportive for inter-urban breaks



to be greatly substantiative. This is where the current 2023 SEQ Plan Update is merely conforming to the historical urban sprawl (Map 17). In rhetoric of Table 15, the 'Scenic amenity areas' and the 'Regional greenspace network' *is mostly the existing 'Inter-urban breaks'*. Historically, it goes back to Lord Mayor Jolly's Green Belt Plan, and while remnants remain in the sea of the urban sprawl, the Plan was shown to fail – not due to its noble intentions and principles, but that there was no evidence shown, at the time, the Plan would not be eroded. The were no legislated guarantees. The *State Government's South East Queensland Regional Plan 2023 Update* does exactly the same thing. Although it is subtle, the most significant problem in the thinking is the obsession in economic theory (often shown to be flawed) and resources (exploited for the benefit of the few). Map 18 and Table 16 demonstrates this truth by the narrowness of thinking:- inferred by colourful illustration and sharp rhetoric, without the required evidence. As a final insult to the situated public, we note that Map 19 has mislabelled markers and that the only "SEQ Great places" on Southern Brisbane is, apparently, three markers on the Kuilipa-South Bank-Kangaroo Point river reaches. Nothing illustrates the gross prejudices and distorted thinking better in the Plan, and speaks to what comes of politicians and bureaucrats without the comprehensive education, and who are unfamiliar with the landscape.

The Southern Brisbane is made up of diverse populations. A disability perspective has a role here in contributing to more of the detail, diversity and resonance of the people who live in Southern Brisbane. This is tied to health and disability social perspective informed by the lives of people with disabilities (Chapman, K., Allen, C., and Kendall, E. (2023). *The Voice of Queenslanders with Disability*. Griffith University). The facts reflect the voices of people with disability and their family members, and carers who contributed their lived experiences. What is striking in the SEQRP, is regional land Map 17, in that the survey highlights local business serviced for and by people with disability, but with poor accessibility. Queenslanders told us that for some, "life was getting better, with more stable income, employment, and secure housing. Conversely, Queenslanders also told us that for some, life was getting worse, with challenges to health, income, and supports" (Map 9: 23 the voice Queensland disability). Lack of accessible services and linkages, such as transport infrastructure, impacts and shapes with community living experience that are reflected in the survey finding and result.

What is also striking in the SEQRP Plan is Map 18, water catchments and management storage of drinking waters. In the lives of people with disability, one of the largest population is people with illness and pain, whereby water has a central role in caring and health processes, we also have a recreational culture that highlights swimming and its benefits to health and wellbeing (Table 12). The project's identification focuses on the efficient and sustainable movement of people and goods, prioritising projects that enhance access to RECs, MEIAs and high amenity areas. TMR has been hard on building an integrated transport system where an aspect of this development has been co-designed with people with disability of all types of disability. What the survey has to say about infrastructure, pages 36-39, highlights problems in accessing accessible houses and affordable, with 23% rating their public transport experiences as bad or very bad. Where participants live may or may not have impacted these experiences, with participants from regional and remote areas noting increased challenges with access and inclusion (p. 37, and p. 23 cite E, Kendall.)

The key Vision for the next fifty years has the following paragraph embedded in it: Lifestyle and housing choices will be available to people of all ages and abilities. It also has the historical and socially bound in a major belief that is popular. This is that human capability and growth would be endless, and a contrast of QDN report and the plan. We have the challenge of an uneven spread of population to the North to Caboolture, South to Coolangatta, and West to Toowoomba. The survey has voices of hope. Highlighting four voices of an alternative vision:



- Firstly, participants told us that the voice of the community should be promoted and safeguarded through citizen leadership and monitoring mechanisms for the design, delivery, and implementation of any action.
- Secondly, participants called for improvements to standards of living and social (Final Report V1.0: 24 May 2023). The Voice of Queenslanders with Disability asserts to improve economic security, accessible housing, increased employment opportunities, and support lifelong learning.
- Thirdly, enhancing dignity and equity was mentioned to promote an inclusive society where everyone
 can participate fully. Finally, participants told us that we need to strengthen belonging across the state,
 fostering a sense of community and connection.

The facts and appreciation of this challenge and struggle of people with disability and their families need to be responded to by our leadership towards inclusive community design. This may be challenging for the best of our leadership and measure their strengths. Not because they are easy, because they are hard, because the goal will serve our energy and skills, because that challenge is one that we are willing to accept.

For the Southern Brisbane areas (extending into north Logan for the purpose of this critique, i.e., spillage of Brisbane South into Logan) are:

- 1. The Upper Mount Gravatt PFGA (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive, but it requires a much better transport plan and much better building plan than the Brisbane City Council currently is operating under. The City of Brisbane already has historic high density, and it is a mystery why the Council professional planners are not openly honest about that fact. The PFGA plan might require a few moderately higher multiple level complexes, however, that needs to be limited by a legislative guarantee with a fixed number tolerable to the local community. The best location would be the central and near-by office-industrial parks.
- 2. The Carindale PFGA (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive, but it requires a much better transport plan and much better building plan than the Brisbane City Council currently is operating under. The City of Brisbane already has historic high density, and it is a mystery why the Council professional planners are not openly honest about that fact. It would be inappropriate for the PFGA plan to allow higher multiple level complexes, and this should have a legislative guarantee. The area is also highly residential in the road corridors.
- 3. The Browns Plains PFGA (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive. The City of Logan is already moving into higher density. The PFGA plan might require a few moderately higher multiple level complexes, however, that needs to be limited by a legislative guarantee with a fixed number tolerable to the local community.
- 4. **The Logan Central PFGA** (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive. The City of Logan is



already moving into higher density. It would be *inappropriate for the PFGA plan to allow higher multiple level complexes*, and this should have a legislative guarantee. The area is also highly residential in the road corridors.

- 5. The Springwood PFGA (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive. The City of Logan is already moving into higher density. The area already has a few moderately higher multiple level complexes, and the Forum merely questions, whether in the PFGA plan might require a legislative guarantee with a fixed number tolerable to the local community.
- 6. The Logan Hyperdome PFGA (Map 22): The area is an already high-density retail hub. This fact already presents significant economic problems. In principle the Forum is supportive. The City of Logan is already moving into higher density. The PFGA plan might require a few moderately higher multiple level complexes, however, that needs to be limited by a legislative guarantee with a fixed number tolerable to the local community.
- 7. **Brisbane 2032 Olympic-Paralympic venue/village** (multiple facilities, Map 22): The Queensland Government has completely ignored the concerns of the SBSF and the other Brisbane Southside organisations.
- 8. **The Brisbane-Gold Coast Corridor** (Map 25): The green space regional biodiversity corridor is not a corridor, it is not in the corridor. It is mostly part of the thin National Park landscape. It has nothing new in preservation.
- 9. The Melbourne to Brisbane Inland Rail (Table 12, from 2017): In principle the Forum supports the concept, however, among our members there remains concerns about pathways through suburban areas and landscape impacts. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).
- 10. Salisbury to Flagstone Passenger Rail (following the Salisbury to Beaudesert Corridor, (Table 12, from 2017): In principle the Forum supports the concept. There might be, however, concerns about pathways through suburban areas and landscape impacts. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).
- 11. Bromelton North—South Arterial Road, as part of the Mount Lindesay Highway upgrade (Table 12, from 2017): The Forum notes the ongoing Mount Lindesay Highway upgrade. It notes the historical concerns about the highway through suburban areas and landscape impacts. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in



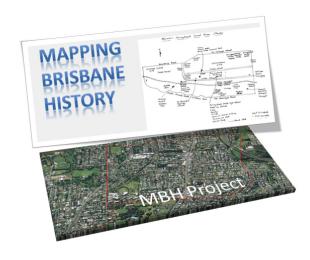
the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).

- 12. Park Ridge Connector (Table 13, 2023): The Forum is supportive of the concept. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).
- 13. Improved road and public transport connectivity between Yarrabilba and the Mount Lindesay Highway (including Camp Cable Road and Cusack Lane upgrades, Table 13, 2023): The Forum is supportive of the concept. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).
- 14. Coomera Connector (Table 13, 2023): The Forum notes that Logan community organisations have raised concerns about pathways through suburban areas and landscape impacts, naming increased flooding risk in the area, and wildlife impacts. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).
- 15. *Inner Brisbane walking Initiative* (Table 13, 2023): The Forum is very supportive but the initiative does not counter-balance against the key problems in The Gabba Re-development for the Brisbane 2032 Olympic-Paralympic venue/village (multiple facilities, Map 22) which the SBSF had submitted to the Government, and was rejected.
- 16. Logan and Gold Coast Faster Rail (Table 13, 2023): The Forum is supportive of the concept. It is recommend strategies for minimising those impacts, and the economic costs is not the priority issue, when lives in the community are equally landscaped by poor ecological planning. It is responsibility of the government to manage the economic cost for the benefit of members of the community, to which government services (not the other way around).

The 'invisible elephant in the room' is that there is no evidence for the capacity of the State Government to meet its obligations, and, importantly, to represent the majority view of Queenslanders, which at the same time, allowing the Commonwealth to impose unreasonably high levels of population movements which is disproportionately impacting South East Queensland at this time. This is a critical question of overall population demand, and the attention should not be diverted into the Commonwealth's responsibility for decisions in the transiting the country's population movements. The State government's responsibility is to protect Queensland's urban and ecological environments, at local and regional levels, and better governance should compel it to resist undue demand.







The Southern Brisbane Suburban Forum is committed to strengthening sustainability.

Yours sincerely

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