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## West End Community Association Inc.

04 May 2015

Development Assessment  
Brisbane City Council  
GPO Box 1434  
Brisbane Qld 4001

To whom it may concern

### **RE: Development Application A004034226 (9-15 Ferry Road and 403-5 Montague Road, West End)**

This submission is made on behalf of members of the West End Community Association (WECA) who have raised concerns regarding the development proposed in the Development Application A004034226 ('DA').

Our primary concern is the non-compliance with the South Brisbane Riverside Neighbourhood Plan - Riverside South Precinct (SBRNP) that places unsustainable pressure on the area and supporting infrastructure, and will result in poor community outcomes. The key issues we would like Council to consider are:

1. Unsustainable density
2. Lack of provision of required open space
3. Supermarket out of step with area
4. Impact of >7 storey buildings
5. Loss of site zoned for education
6. Cumulative impact of multiple developments on amenity

#### **1. Unsustainable density**

The area addressed by this DA is within a 7ha area between Montague Rd and the river and Ferry St and Rogers St. Based on data presented in Map 1 below, we estimate that this area will contain 1,500 units, a population of 4,500 people and a population density of 64,000 people per square km. This is higher than the Brisbane CBD, higher than that proposed in the 2014 Kurilpa Master Plan, and higher than any city area in the world. This is not appropriate density and out of step with leading practice urban design which supports medium density development.

Additionally, the DA is seeking a large number of major relaxations of relevant Codes (Multi Unit Dwelling Code and the SBRNP Code) for boundary setbacks, separation distances between buildings, balcony size, private open space above ground level and car-parks, all of which play a major role in establishing the density on the site. The codes should be enforced to meet development outcomes and to maintain credibility of the codes.

## **2. Lack of provision of required open space**

Council requires that large sites (>1ha) are required to provide 20% publically accessible open space. This DA provides only 8.6% publically accessible green space. The remainder is footpaths, laneways and car-parks that are required under the road network upgrade of the SBRNP. Although these spaces may technically satisfy the Council definition of open space, it does not align with a community understanding of public open space. The requirement for publicly accessible open space was to provide corridors between buildings for casual interaction and reflect good sub-tropical design. The public open space should allow a pedestrian link to the Brisbane River.

## **3. Supermarket out of step with area**

We understand that there is a supermarket proposed as a key tenant in the retail component of the development. In October 2013 the Lord Mayor committed that there would be only one supermarket in the Riverside South Precinct (Precinct 7). In addition to the lack of feasibility of another supermarket in this area to compete with the nearby existing Aldi supermarket, the proposed addition of a supermarket is out of scale with the residential nature of this part of West End.

## **4. Impact of >7 storey buildings**

The 7ha area dominated by 11 and 12 storey buildings does not comply with the SBRNP that stipulates that "Development will provide a range of dwelling sizes and types with a predominant height of 7 storeys". These proposed much higher buildings this close to the river are inappropriate and out of proportion with surrounding structures.

## **5. Loss of site zoned for education**

This site was one of the few sites in the Kurilpa Peninsula zoned for education purposes. Both West End State School and Brisbane State High School are at capacity with no room for population increase.

## **6. Cumulative impact of multiple developments on amenity**

The impact of this single development on the surrounding community and businesses as currently proposed will have significant negative impact in terms of traffic management, school capacity, child-care capacity, facilities such as medical centres, post-office and community space, accessible green space, impact on small business, and flood mitigation. However when you consider this in the context of the cumulative impact resulting from multiple developments, the negative impact is much more significant. If we just consider the most significant current DAs - West Village development on Boundary St (1,350 apartments), the Light & Co development at 321 Montague Road (460 apartments), the South Brisbane TAFE site (602 apartments) and this development (476 apartments) we have 2,864 new apartments and no increased social infrastructure. If we then consider the Kurilpa Master Plan area currently under review by the State Government, and many other recent and smaller future developments, the population increase and associated pressure on facilities and services is significant and unsustainable.

Planning provisions for social infrastructure does not support the proposed extreme scale and density of development in South Kurilpa and this will result in long-term economic and social costs.

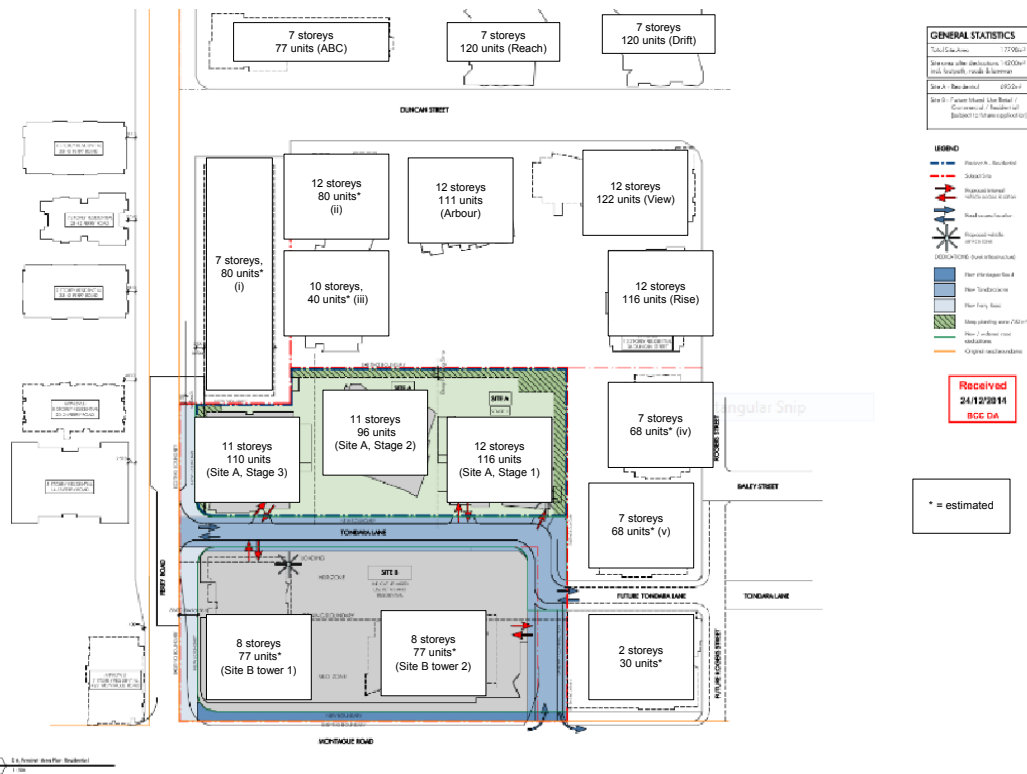
This scale of development across the peninsula without supporting social infrastructure will result in a place people don't want to live because of decreased amenity and for those who live here, a significantly decreased level of amenity and quality of life.

**Request**

We request that Council consider the following development alternatives with respect to this DA:

1. Council reconsider the current social infrastructure planned to address the cumulative impact of multiple developments on amenity
2. Council negotiate with the State government re-purchase the land to provide additional educational facilities in West End to address over-crowding of current facilities in the catchment
3. If option 1 is not possible, then require this DA be amended to:
  - a. address non-compliance with SBRNP including height, public open space and all other requirements
  - b. provide for a public park of 20% of the site area (0.354 ha) between Montague Road and Duncan Street, with access to Riverside Drive
4. Conduct a strategic (not site-by-site) review of existing and proposed supermarkets in West End, in particular the risks of excessive supermarket capacity and location on a major road.

**Map 1. Recorded and estimated number of units, Ferry to Rogers St, West End**



Yours sincerely

(on behalf of ) Erin Evans  
 President  
 West End Community Association