

14 August, 2016.

The Hon Jackie Trad,
Deputy Premier & Minister for Infrastructure, Local Government and Planning
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Dear Deputy Premier and Minister

**Re: SUBMISSION FROM KURILPA FUTURES GROUP, DEVELOPMENT APPLICATION
ABSOE SITE, 111 BOUNDARY ST WEST END (WEST VILLAGE PROPOSAL)**

I am writing on behalf of the Kurilpa Futures Group to support your proposal to call-in this application for ministerial decision. We believe that the Brisbane City Council's decision to approve this application is flawed and would adversely impact significant state interests on the following grounds:

1. Regional Planning considerations: The proposed development far exceeds the level of demand for dwelling construction as indicated in the current SEQ Regional Plan and allocated in the City Council's own City Shape strategy, at a time of rapidly reducing demand for inner city apartments. As a result, the over-development is unjustified and would result in unplanned and unmanageable infrastructure demands on provisions for traffic, schools and open spaces. In addition, recent approvals, which would be compounded by this very large proposal, already amount to twice the intensity envisaged in the Council's own South Brisbane Neighbourhood Plan- which proposed a growth of 10,000 dwellings over 20 years, a rate already far exceeded by the current yield of 5,000 in the last five years. Further development would exacerbate this situation, leaving the State government to pick up the pieces of unmanageable demands for already stressed services of education and community support.
2. Flawed process: The City Council's decision on this overall application should not have been made in advance of, and therefore prejudiced by, prior approval for the very substantial Stage One, amounting to 450 dwellings. Nor should the decision have been made to accept that privately managed podium space would equate to the publicly accessible open space requirement of 20% of the site, stipulated in the Neighbourhood Plan. Both of these examples of prejudicial process contributed to an unjustified decision to approve the application, which can only be rectified by exercise of overriding Ministerial prerogatives.
3. Obvious overdevelopment: the proposed 1,350 dwellings (plus extensive commercial uses including an oversize supermarket) on a site of 2.6 ha. gross area, would result in a net residential density of over 1,000 persons per hectare, which is not appropriate for a suburban District Centre and is very much greater than is proposed in the Priority Infrastructure Plan for the Area. Any argument for the market need for this intensive this over-development is vitiated by current and projected demand for inner city apartments, which is actually contracting.

In summary, this proposal for excessive, inappropriate and inequitable addition to new apartment construction, far exceeds the total dwelling growth for West End implied within the overall allocations of the current SEQ Regional Plan. This would result in unmanageable and unsustainable stress on public infrastructure of road access and

public transport, schools, and other physical and social infrastructure of drains, utilities and services. Destruction of heritage and urban traditions would place further stress on already deficient open space, all combining to impact negatively on tourism and visitors to the South Bank/West End cultural precinct, currently Brisbane's major tourism attraction and also Brisbane's holiday, celebration and festival centre.

Therefore, we strongly support the option of the exercise of your powers under the Sustainable Planning Act to call in this application for decision by yourself as Minister for Infrastructure, Local Government and Planning. All three of these responsibilities are directly and negatively impacted by this most significant proposal.

Yours most sincerely,

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