DATE XX February 2016

YOUR NAME

YOUR ADRESS

YOUR EMAIL

**pdadevelopmentassessment@dilgp.qld.gov.au**

Dear Assessment Manager,

**RE: DEV2015/727 ( 202 500m²)**

**820 GREENBANK RD, NORTH MACLEAN INDUSTRIAL AREA**

 **( LOT 2 RP868726) GREATER FLAGSTONE**

**PDA DEVELOPMENT APPLICATION FOR A PDA DEVELOPMENT PERMIT FOR RECONFIGURING A LOT – 1 INTO 12 LOTS WITH A ROAD AND BALANCE LOT**

I object to this application and request that it is not approved. It is my understanding that a decision on this application was due on or before the 27 January 2016, but this has now been extended by 15 – 20 days.

**I do not support an industrial area anywhere at North Maclean** and public notification MUST be granted to the community in this extenuating circumstance.

My objections to this application are –

1. **Public Notification**

**No public notification occurred for this application**, yet over the last 11 years, the state government and Logan City Council have received many emails, letters and submissions ( e.g. in 2015 Logan City Council Draft Planning Scheme public consultation period) from concerned residents in the area of North Maclean, Munruben and Greenbank who have repeatedly outlined their opposition and concerns about Industrial land use being inappropriate and in conflict with an existing long term Rural Residential area.

***( If you live in Rosina Rd you need to say something like e.g. As a directly affected resident, I have a right to be publicly notified about ANY application proposed for the North Maclean Industrial Area, especially because this is proposed as Industrial land use which has higher impacts than other land uses)*** This is why public notification MUST OCCUR for this application and for any future applications (of any type) lodged in any part of the proposed North Maclean Industrial Area or in properties adjacent to this industrial area.

1. **Out of Sequence Application**

**820 Greenbank Rd** ( DEV 2015/727) has been lodged with the **State Government** and is proposing lot reconfigurations that may be in conflict with future Federal Government vegetation protection or conditions relating to vegetation or connectivity of vegetation that may be placed on a **Federal Government application EPBC 2013/6941**. EPBC 2013/6941 adjoins 820 Greenbank Rd. Any approval at this stage by the State Government would be premature , especially if the environmental and other investigations have not been conducted for other adjacent lots e.g. to the east and west of DEV2015/727.

1. **Federal Government Matters of National Significance ( Environment )**

The property at 820 Greenbank Rd shares an adjoining north-eastern boundary line with the WEARCO property ( EPBC 2013/6941), and as such would be potentially subject to EPBC referral and assessment, just as with the EPBC 2013/6941 WEARCO property. The species of particular interest at a state government level ( **Nature Conservation Act)** include but are not limited to the koala, spotted tail quoll, the glossy black cockatoo, grey headed flying foxes and others known to be associated with this North Maclean area. This means that in this situation for 820 Greenbank Rd, that potentially the State Government could give authority for something which the Federal Government may not in fact approve (given the **four deferrals of the decision for the WEARCO site thus far since August 2015)**. The same EPBC listed fauna species associated with the WEARCO site, such as the spotted tail quoll, koalas, and grey headed flying foxes are of interest in relation to 820 Greenbank Rd North Maclean. Any approval at this stage for 820 Greenbank Rd is premature , especially if the environmental investigations have not been conducted for other adjacent lots to the east and west of the property.

1. **Melaleuca irbyana**

The Stormwater Management Plan has indicated that the water runoff and overland flow from the **eastern side** of 820 Greenbank Rd currently flows towards the adjoining eastern property Lot 1 RP113251 . The Stormwater report also states that 95% of the flow from the **western catchment** will be redirected to this same property Lot 1 RP113251 as a legal point of discharge.

The property located on thhis eastern side of 820 Greenbank Rd is completely vegetated and the endangered EPBC community *Melaleuca irbyana* is associated with this area at North Maclean. *Melaleuca irbyana* is very sensitive to any changes to drainage, thus any changes in the topography of 820 Greenbank Rd ( eg cut and fill, redirecting water flow) would potentially have offsite impacts on Melaleuca irbyana and other vegetation at this location. This impact on *Melaleuca irbyana* alone would require a Federal Government EPBC referral.

**This application should not be approved.**

1. **No Master Plan Vision Exists for the Whole North Maclean Industrial Area**

The community of North Maclean and Munruben haveopposed any industry in this area for the past 11 years and the community continues to oppose it today.

It is obvious from the reports and documents provided for EPBC 2013/6941 and 820 Greenbank Rd ( DEV 2015/727) that **there is NO Master Plan Vision for the whole proposed 800 – 1100 acres of Industry. This was confirmed by State Government Planning Assessment Officers.** This means that as each individual property owner lodges an application for the North Maclean Industrial Area, roads, protected areas of vegetation and other matters may constantly change. There has been NO CERTAINTY for the community in the last 20 years, that this situation is unacceptable.

Other large developments in the Greater Flagstone Area have had to have Master Plans ( Context Plans) and have and continue to consult with the community about ongoing matters. However, this has NEVER occurred for the North Maclean Industrial Area in the last 20 years. Over the years since 2006 ( eg SEQRP Review 2009, Greater Flagstone Structure Plan 2011, Logan City Council Draft Planning Scheme 2015) , the community has been advised that “there will be more detailed planning and consultation at a later stage” – THIS HAS NEVER OCCURRED.

**The community of North Maclean and Munruben have opposed any industry in this area for the past 11 years and the community continues to oppose it today.**

1. **Community Petitions**

In 2006 a community petition of almost 1000 people from the North Maclean and surrounding suburbs including Jimboomba and Beaudesert, indicated 89% of people opposed Industry at North Maclean.

Since 2015, 3 960 people have signed an online petition, hard copy petition and hard copy postcards to request that Industry is not approved for North Maclean. Copies of the petition have been sent to Greg Hunt, and hard copy postcards have been sent to Greg Hunt and Jackie Trad.

**The community of North Maclean and Munruben have opposed any industry in this area for the past 11 years and the community continues to oppose it today.**

1. **Traffic Concerns**

The applicant’s Traffic Report for 820 Greenbank Rd is recommending on Page 4 & 10 ( see CONCLUSION & RECOMMENDATIONS section with bullet points) – the 3 external road entry and exit points mapped for the whole of the North Maclean PDA ( ie one at Crowson Lane at Greenhill Rd, two at Greenbank Rd) are “ *unlikely to have adequate intersection capacity to serve demand*” .

The traffic Report recommends on Page 10“ ***that further research be undertaken into the ultimate development potential of the PDA and establish the future connections required to the external road network and their staging after the development of the  site and adjacent western developments***” .

The internal road design for the whole of the NORTH MACLEAN Enterprise Area is estimating a maximum volume to be **4300 vehicle trips per day ( p 4 Traffic Report) or 570 in peak hour** to be using the **internal road proposed for the whole North Maclean Enterprise Precinct** .

Traffic impacts on Crowson Lane, Greenbank Rd and Scotts Lane, Chambers Flat Rd will be huge, as well as for Teviot Rd and the Mt Lindesay Highway .

Planning future traffic movement through and around any development, let alone 800 – 1100 acres of INDUSTRY is relevant to public interest, public safety and local residents who may be affected by 820 Greenbank Rd and the whole of the proposed North Maclean Enterprise Area. **However, the community has never been consulted or asked to comment on this matter.**  **No community engagement for any intended plan for the total North Maclean Enterprise Precinct Area has ever occurred**. **No public notification has occurred for 820 Greenbank Rd.** This is unacceptable to the community and we demand that (a) no approval for the current application be given and (b) public notification be allowed in this instance.

1. **Planning Report Concerns**
* No vegetated buffers are indicated or mentioned for directly affected rural residential properties or sensitive receptors on Rosina Rd , Greenbank Rd, or neighbouring properties to east and west of 820 Greenbank Rd. However, this is a requirement in the Greater Flagstone UDA Development Scheme. The community **MUST BE** consulted in relation to this matter, however the community has never been consulted about anything in realtion to the North Maclean Industrial Area e.g. buffers, buffer widths. These matters should have been discussed in the last 20 years but they have not and are still not even taking place now. **This application should not be approved.**
* On p 11 the planning report claims that the proposed land uses “will not adversely impact the surrounding environment”. However, the community has no confirmed or detailed information about the final proposed land uses that may occur on this site – only generic statements like “ future Low Impact Industry and Service Industry”. It is likely that impacts including negative impacts will occur.
* The report states ( p 13) that “ there will be disturbance of koala habitat as a result of any development”. This application indicates the intent to reduce the vegetation available, and to reduce habitat connectivity available to koalas by clearing this vegetation. This application should not be approved. Monetary offsets do not ensure the retaining of vegetation or the connectivity of habitat on the site of 820 Greenbank Rd.
* The areas being proposed as vegetation offsets will be impacted by easements for power, bushfire management and water infrastructure. Runoff and sediment will also have negative impacts on the proposed vegetation offsets. The vegetation offsets should retain connectivity of habitat and should not be used for infrastructure corridors.
* Vegetation communities at 820 Greenbank Rd and vegetation linkages and connectivity to other adjacent properties and stepping stones in the landscape will be lost . **Planting offsets will not replace the established vegetation** that is being proposed for clearing with the eventual development of the site. This application supports the intent to remove the vegetation at a later stage which we do not support. The age of the existing vegetation cannot be replaced, and any plantings will not be of the same maturity. This location is known to be associated with State vulnerable species such as the glossy black cockatoo and spotted tail quoll. The glossy black cockatoo relies on mature vegetation with hollows for nesting sites. Nesting pairs are known to return to the same nesting tree. Glossy black cockatoos are known to be associated with the North Maclean area. All vegetation on the North Maclean should be retained and connected. Offsets, especially monetary offsets, do not achieve this.
* 4 storey high buildings ( elevated on a high point in the local area) are proposed but because this application is a Reconfiguring of a Lot, there is no detail about this matter. Four storey high buildings will have a negative impact on the scenic amenity of the local rural residential area. The light impacts at night will have an impact across the local area because of the elevated nature of the property .
* Retaining walls are proposed e.g. 5.8 metre fill on the north-east corner of Lot 10 and 3 metre cut along the rear of Lots 7-9 ( on the southern side of Rosina Rd properties) . No detail is given but is deferred to a later Operational Works stage – this is unacceptable to the residents. Cut and fill on the northern boundary of 820 Greenbank Rd will result in increased erosion risks for directly affected properties in this location because of the topography and slope . Not all batters and earthworks will be in accordance with LCC’s policy e.g. wall height exceeds 5m for industrial. This application should not be approved .
1. **Bushfire Management Plan**

The site has a medium and high hazard for bushfire. Vegetation offsets or intended areas for vegetated buffers to residents along Rosina Rd and Greenbank Rd and neighbouring properties **should not be cleared to accommodate bushfire management easements** as currently stated in the Bushfire Management Plan. Any bushfire management easements should be provided for on the cleared portion of any proposed development ie not within the vegetation offsets or buffers being provided for directly affected residents. Vehicle turning points ( which require larger areas of clearing) also should not be cleared and located within the vegetation offsets or buffers. This application should not be approved. Vegetated buffers and the Bushfire Management Plan should have **community input and public notification** because this is a matter of public safety.

**CONCLUSION**

**This application for 820 Greenbank Rd should not be approved. Any decision on this application should be immediately suspended and public notification MUST occur for this application and ANY future applications.**

There are **very serious and real concerns** **regarding NO COMMUNITY CONSULTATION** for the proposed NORTH MACLEAN INDUSTRIAL AREA for over 20 years – these concerns have been raised many times by the community at local and state government **have been ignored and have NEVER been addressed.**

For over 11 years the community has objected to and opposed the North Maclean Industrial Area ( including 820 Greenbank Rd) which has been proposed in an **existing Rural Residential** area. The community has continued to ask questions about the lack of consultation, negative social and environmental impacts that may occur as a result of this development. This proposed industrial area including 820 Greenbank Rd will not achieve an overriding benefit for the community, it will have significant negative social and environmental impacts. This application for 820 Greenbank Rd should not be approved. **Public notification of all applications in the North Maclean Enterprise Precinct Area must be given** due to the industrial land use proposed, the extent of the proposed industrial land uses, and long term concerns communicated by residents previously to local and state government about this matter.

Yours sincerely,

( YOUR signature – electronic or print your letter sign it and scan it )

Your residential address

YOUr contact phone number

Your email address