Redland City Plan

Southern Thornlands Potential Future Growth Area (STPFGA)

Public Consultation Report

May 2021

Submission Review for STPFGA Proposed Future Land Uses

Introduction

This report has been prepared to summarise the matters raised in submissions on proposed future land uses for the Southern Thornlands Potential Future Growth Area (STPFGA). The submissions received will assist Council in gaining an understanding of whether the community supports or disagrees with Council's proposed future land uses within the STPFGA. This information will also assist Council in determining whether to maintain or alter its proposed policy direction and inform the preparation of a potential future major amendment to the Redland City Plan, if required.

Public Consultation Process

At its General Meeting on 16 September 2020, Council resolved to confirm its intention to prepare a major amendment to City Plan to reflect the preferred future land use intent of the STPFGA. Council also resolved to undertake city-wide consultation on the preferred future land use intent for the STPFGA for a minimum of 30 business days, commencing on 28 September 2020 and running until 20 November 2020 (i.e. 8 weeks or 39 business days). During the consultation period the following community engagement activities were undertaken:

Internet • STPFGA web page created as a repository for information and to facilitate online submissions • 2,190 website visits • 1,170 document downloads • Email correspondence with members of the community	**Phone Calls and Requests** • 5 inbound phone calls • 2 customer requests
Face to Face • 3 meetings with landowners (at landowners request)	**Local Paper** • A column in the Redland City Bulletin on 14 September 2020

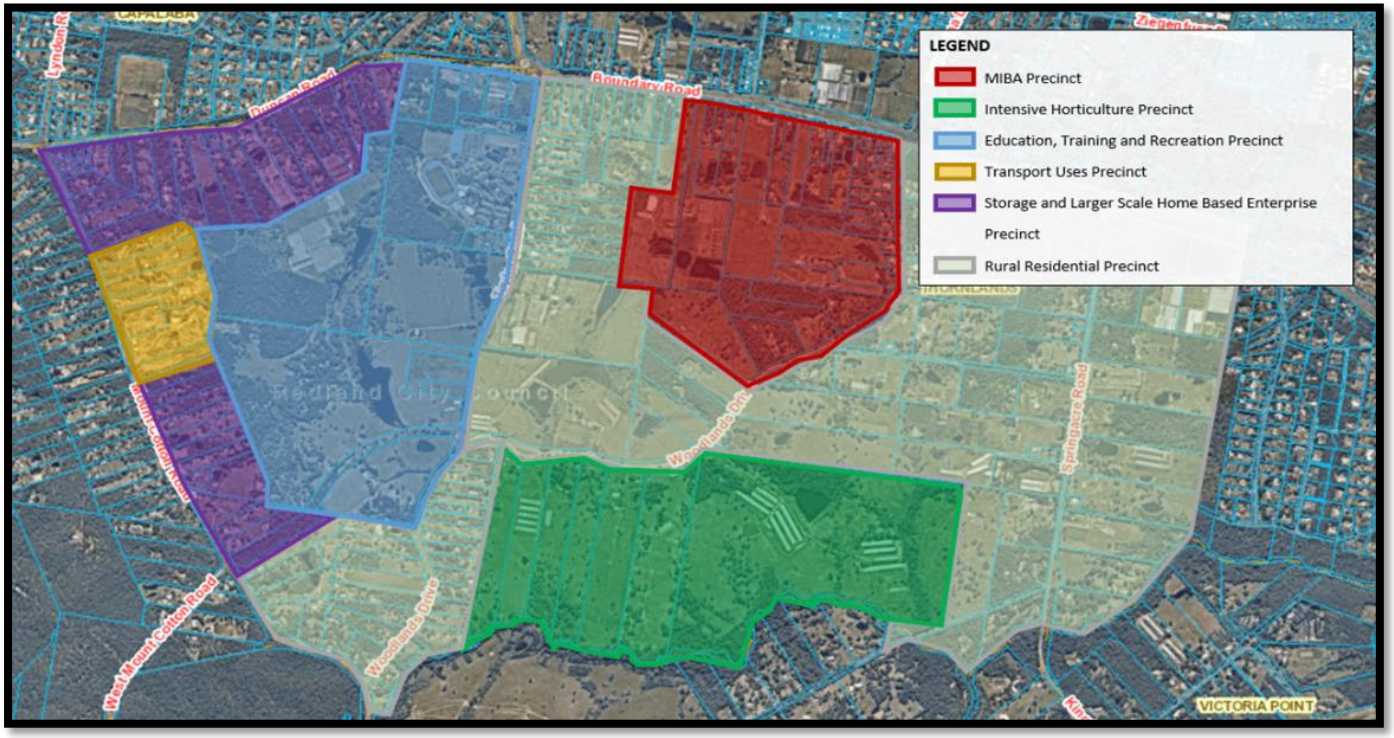
At the end of the public consultation period, Council received 202 submissions. Of those submissions, 190 were received via Council's online submission form and 12 were received via the corporate mailbox (either by email or in hard copy format) – these submissions are referred to in this report as 'individual submissions'. Council saved all of the submissions into a database to ensure they were digitally archived.

Submission Review

Online Submission Forms

As the STPFGA was proposed to contain six future land use precincts (see Figure 1 below), the online submission form was structured to ask submitters whether they supported the proposed land use precincts, the general location of the land use precincts and the reason for this position. Explanatory text was presented in the submission form to provide a brief overview of the land use intents being consulted upon. As well as capturing name and contact details, the form also presented respondents with the following open ended question: 'Do you have any other comments on Council's proposed land use intents for the STPFGA?'

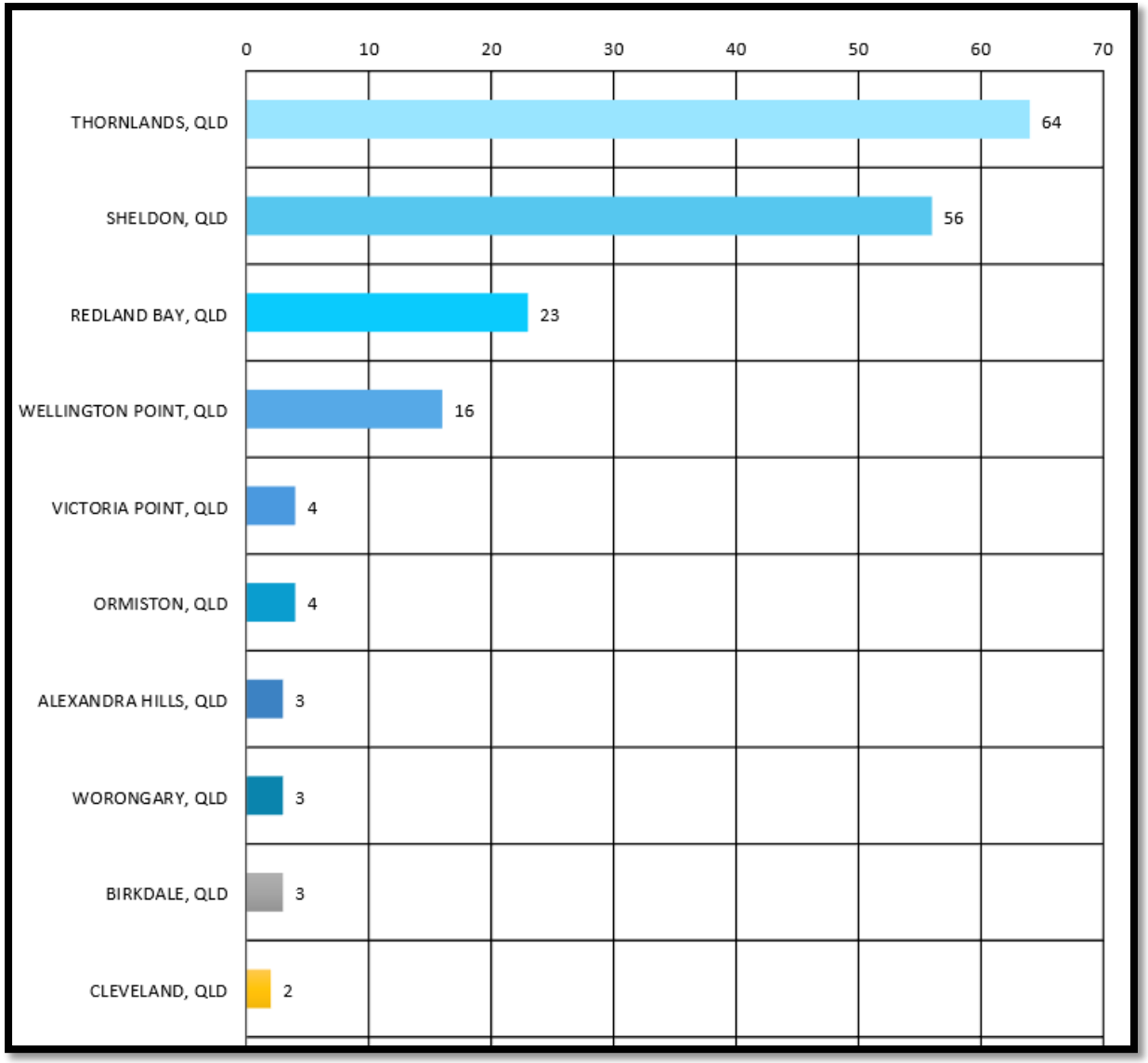
Figure 1: Council's proposed land use map (public consultation version)



Suburb of origin – online submission forms

The following table provides an overview of suburbs where submitters resided. As the STPFGA spans across two suburbs, being Thornlands and Sheldon, this demonstrates that a large proportion of submitters resided in the study area. The table excludes suburbs that had only one submitter.

Table 1. The suburb in which the submitter resided



Multiple submissions – online submission forms

When analysing the online submissions, it was observed that a number of individuals made multiple submissions and a number of submissions were received from a single household. This has inevitably impacted upon the percentage of people that support or did not support each of the proposed land use precincts. Despite this, when considering the submissions as a whole, the majority of people that made submissions were in support for the land use precincts being proposed and their general location. It is noted that of the 190 online submissions:

- 8 people made multiple submissions
    - 2 submissions – 6 people
    - 3 submissions – 1 person
    - 4 submissions – 1 person
- 26 households made multiple submissions
    - 2 submissions – 10 households
    - 3 submissions – 9 households
    - 4 submissions – 1 household
    - 7 submission – 1 household
    - 9 submissions – 1 household
    - 12 submissions – 1 household
    - 14 submissions – 1 household
    - 15 submissions – 1 household
    - 18 submissions – 1 household

Submission Analysis

Views on the proposed land use precincts - Online submission forms

The following section details whether the submitters supported or did not support the inclusion and proposed location of the land use precincts.

Question: Do you support the inclusion and proposed location of a **Mixed Industry Business Area (MIBA) Precinct** in the STPFGA?	
Support: **169**	89%
Don't Support: **21**	11%
Question: Do you support the inclusion and proposed location of an **Intensive Horticulture Precinct** in the STPFGA?	
Support: **153**	81%
Don't Support: **37**	19%
Question: Do you support the inclusion and proposed location of an **Education, Training and Recreation Precinct** in the STPFGA?	
Support: **173**	91%
Don't Support: **17**	9%
Question: Do you support the inclusion and proposed location of a **Transport Uses Precinct** in the STPFGA?	
Support: **166**	87%
Don't Support: **24**	13%
Question: Do you support the inclusion and proposed location of a **Storage and Larger Scale Home Based Enterprise Precinct** in the STPFGA?	
Support: **165**	87%
Don't Support: **25**	13%
Question: Do you support the inclusion and proposed location of a **Rural Residential Precinct** in the STPFGA?	
Support: **171**	88%
Don't Support: **19**	12%

Feedback on land use precincts – Online submission forms

This section analyses the feedback provided by submitters via the online submission forms. It aggregates feedback from the 190 online submissions. It is important to note that not all people that made an online submission took up the opportunity to provide specific comments on Council's preferred future land use map.

Table 2: Grounds of submissions and how Council has considered and dealt with each submission – Online submission forms

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Precinct: Mixed Industry Business Area (MIBA)		
Theme: Infrastructure, roads and traffic		
Once the area is serviced by sewer it will be opened for housing development.	The preferred future land use intents that were released by Council for public consultation included one precinct (the Rural Residential Precinct) that is intended to accommodate further residential development in the STPFGA, albeit at fairly limited scale. Council's intent is to facilitate the creation of additional unsewered lots with a minimum lots size of 1 hectare or greater in this precinct. Excluding the properties in the centre of the STPFGA that have, through the court process, been approved for rural-residential style development, there are 53 other allotments in the Rural Residential precinct that are 2 hectares or greater in size. Theoretically, not considering other constraints that may impact on reconfiguration, it may be possible for an additional 182 unsewered allotments, sized 1 hectare or greater to be created from these 53 allotments. Any extension of the sewerage network to support a future MIBA would only be designed to address the reticulated sewerage needs of this precinct. Council's policy position is not to support or provide reticulated sewage options outside the proposed MIBA. In advising the Planning Minister of Council's preferred future land use intents for the STPFGA, in an information package supplied on 25 September 2020, Council advised that it 'does not	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	support the expansion of the Urban Footprint to accommodate urban residential development in the STPFGA.' The abovementioned information provides clarification that Council does not support urban style housing development occurring in any part of the STPFGA. As outlined in section 9.1 of the STPFGA Planning Report, it is Council's view that there is already a sufficient quantum of land within the Urban Footprint to accommodate future population growth to 2041.	
Infrastructure for the area (roads, sewer and water) will need to be upgraded. Further traffic will: • compound driveway access issues for landowners. • increase traffic in an already congested area. • reduce safety/liveability. • not be welcomed by existing residents in the area.	Noted as a general observation. If Council decides to proceed with a major amendment to City Plan, more intense forms of development (e.g. a MIBA) may eventually be delivered in the STPFGA. However, before development could occur, detailed structure planning of the MIBA would need to be undertaken, which would involve amongst other things, a consideration of future infrastructure requirements and requisite upgrades to the relevant networks.	No changes required.
Theme: Environment		
• Bushland in the area should be conserved for wildlife, including koalas. • A large number of wallabies are killed on Woodlands Drive already – further development will increase threats to wildlife. • Due to recent development in the area, wildlife habitat has been reduced. Wild animals need to have safe habitat. The MIBA would have detrimental impacts on wildlife and the environment.	Prior to identifying preferred future land use intents for the STPFGA, Council officers prepared a planning report to examine values and constraints across the study area. The analysis included a consideration of wildlife corridors (as per Council's Wildlife Connections Plan 2018 – 2028) and environmental values such as Matters of State Environmental Significance (MSES), which includes core koala habitat areas and Matters of Local Environmental significance (MLES).	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Development in the MIBA will obstruct environmental corridors. The area has high wildlife and bushland diversity. It should not be developed for this purpose.	The planning report identified these areas generally as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. Although the entire STPFGA has been assigned a precinct, this does not mean that each precinct will be 'fully developed'. Rather, parts of the sites will be retained because they contain a constraint or value that needs to be addressed/protected. For example, the proposed MIBA precinct is approximately 100 hectares in size but if developed, is intended to provide approximately 50 hectares of developable land. This means that approximately 50% of the MIBA is likely to be retained to accommodate features including, but not limited habitat areas, environmental corridors and flood impacted areas. Should Council proceed to detailed structure planning of the area, further detailed ecological investigations would be undertaken.	
Chemicals from industrial activity will adversely impact on Eprapah Creek, a valuable community asset.	As noted in Attachment 4 to the Council Report that was considered by Council on 16 September 2020, the MIBA precinct is envisioned to accommodate a broad range of commercial and industrial employment opportunities including professional services, higher order industrial uses (e.g. creative industry and advanced manufacturing), education, training and research facilities, information technology and communication services, office services and service trades with a high number of employees per hectare. Despite this, it is acknowledged that certain industrial uses may seek to establish in the MIBA precinct and that the potential for adverse off-site impacts exists. These impacts would be strictly managed in a number of ways, including but not limited to:	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	provisions within the planning scheme and State Government legislation (e.g. the *Environmental Protection Act 1994*).	
Theme: Economics, timing for delivery and need		
The MIBA will: • create more opportunities for local business • increase employment opportunities in the area • support expansion of business • avoid the need for residents to leave the area for work • support shops for independent and handmade businesses • Support for the Redlands as a future hub of business and industry leadership. Creating the MIBA will attract talent and expertise locally and further afield. The Redlands as a whole will benefit.	Noted as general support for the MIBA precinct.	No changes required.
Development in this area would adversely impact the tourism industry, which also provides local employment opportunities.	The STPFGA planning report (the report) acknowledges that the STPFGA contains important values that are worthy of protecting, including Matters of State Environmental Significance, higher order wildlife corridors and viewsheds from key vantage points. The report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. While Council envisions that higher intensity development will occur in certain parts of the STPFGA over time, it is Council's intent to strike a balance between facilitating development and	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	protecting important values in the area, which may include values that attract tourists to the area. If Council decides to proceed with a major amendment to City Plan, an additional public consultation period will take place following completion of the first State Interest Review period. At this time, the community will have an opportunity to review, in greater detail, the proposed amendments and how important features in the STPFGA are intended to be managed and protected.	
There isn't sufficient need for the MIBA land. It will be undeveloped for years.	As outlined by CDM Smith in the Economic Feasibility Assessment, the delivery of a MIBA represents a longer term opportunity (~15years). This timeframe recognises that significant capacity exists within competitor MIBA precincts in the region to accommodate growth within the short to medium term. In addition, it will ensure potential commercial office take up in the Capalaba and Cleveland principal activity centres is not compromised in the short term. It is also noted that to facilitate the potential delivery of a MIBA in the 15 year plus time frame it is necessary for planning and infrastructure investigations to be commenced at this time, particularly recognising the long lead in times required to bring development to market from planning to delivery.	No changes required.
• There is a need for a low intensity office and commercial uses precinct in south Redlands that is not taking up valuable industrial and heavier impact land uses. • There is a particular need to provide space for start-up industries and businesses that have outgrown their home business location.	Noted as general support for the MIBA precinct. The MIBA could provide opportunities for businesses that are looking to increase the scale of their operations and serve to increase job self-containment within the City.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Theme: Amenity		
• This will be an overdevelopment of the area. • Development will adversely impact on the scenic amenity values of the area. • The MIBA will adversely impact on rural values in the area, through increased noise and traffic. • Development will adversely impact on important viewsheds in the area. • Industrial sheds would detract from the area and discourage tourism. • The MIBA will adversely impact rural residential land values – nobody wants to live in proximity to a MIBA.	• Council acknowledges that some community members do not agree with the proposal to amend City Plan to accommodate alternative (non-rural) forms of development within the STPFGA, such as the MIBA. • Prior to releasing the preferred land use intents map for public consultation, Council officers prepared a planning report to examine constraints and values across the STPFGA. The analysis included a consideration of scenic amenity values, such as viewsheds from Sirromet Winery and the outlook from vantage points along Mount Cotton Roads and Woodlands Drive looking east towards Moreton Bay. More specifically, the report noted: 'Given the southern portion of the STPFGA is visually prominent, forming both part of the Sirromet Winery viewshed and scenic outlooks from Woodlands Drive and Mount Cotton Road, development within this area should not be of significant bulk and scale. Conversely, it should be developed in a sensitive manner with an aim to retaining vegetation wherever possible' (p. 21). • For clarification, the MIBA Precinct would be expected to function and accommodate similar uses to other MIBAs in the region, including Metroplex on Gateway and Brisbane Technology Park. Generally speaking, the built form in MIBA areas is of a higher standard than general industry areas, which usually accommodate large footprint buildings for the purposes of warehousing, transport, storage and general manufacturing. As noted in Attachment 4 to the 25 September 2020 Council Report, the MIBA precinct is not intended to have a strong industrial land use focus, but is	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	envisioned to accommodate 'a broad range of commercial and industrial employment opportunities including professional services, higher order industrial uses (e.g. creative industry and advanced manufacturing), education, training and research facilities, information technology and communication services, office services and service trades' (page 1).	
Theme: Location		
• There are other areas in Brisbane better suited for industrial parks. Don't carve up the last parcels of lands in Thornlands for industrial usage. • Access to transport routes are too far away for the MIBA to be viable. • Council needs to include all land within the MIBA or none at all – the MIBA will adversely impacting properties that adjoin it. • The MIBA should be smaller in scale and located next to the Education, Training and Tourism Precinct. • Industrial buildings are not suitable in the area – manufacturing should locate in South Street/ Weippin Street. • The MIBA is too close to shops in Victoria Point, Cleveland and Thornlands • Council should instead focus on expanding the Industrial park down in Redland Bay. • The area is not large enough to create long term employment opportunities.	• The Economic Feasibility Assessment (EFA) prepared by CDM Smith Pty Ltd acknowledged that competitor MIBA precincts within the broader SEQ context were generally more conveniently located with regard to access to the regional transport network, as well as providing higher levels of fibre and public transport connectivity. • However, given there is limited scope to establish new precincts within eastern Brisbane (as the Brisbane LGA approaches build-out), CDM Smith confirmed that an opportunity exists in the longer term (~15 years) to establish a MIBA in Redland City that will provide an alternative location for prospective businesses to establish. • In evaluating land use requirements for the establishment of a MIBA precinct, CDM Smith notes that 'an allowance of 50 hectares of allotments (translating to the identification of approximately 100 hectares of raw land) for MIBA uses allows for enough scale to assist in ensuring the development of the precinct is financially feasible to a prospective developer.' • Council acknowledges submitter concerns regarding potential impacts of the MIBA on adjoining/nearby landowners. These are valid concerns and would need to be considered as part of detailed structure planning for the area, if Council decides to proceed with a major amendment to City Plan. Planning	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• The MIBA should include all land fronting Boundary Road, including those currently within the Rural Residential precinct. • The extent of the MIBA precinct should be increased (no specific area identified).	Scheme Policy 5 – Structure Plan provides an outline of matters to be considered as part of this process, including: ○ 'Identifying residences…land uses and approvals on the site and surrounding sites' (5.2.2); and ○ Setting out 'how development interfaces to the surrounding neighbourhood…[and other uses]'. • Although it is not possible to pre-empt how this may occur, a common design and layout response would be to establish buffers between land uses. • Section 10 of the CDM Smith EFA contains an Indicative Feasibility Assessment. The analysis contained in this section of the report was used to inform the size and location of the MIBA precinct. As outlined above, the nominal size of the MIBA (100 ha) was chosen because it was demonstrated to be of a sufficient scale to be financially feasible for a prospective developer, using conservative assumptions. In adopting the preferred future land use map, the location of the MIBA was slightly modified from that considered in EFA to take in land that adjoined Boundary Road, to the west of Woodlands Drive. The CDM Smith report notes that 'this frontage provides a high level of commercial exposure and public transport servicing which would enable industry to be visible and accessible'. Lot sizes and land assembly constraints were also considered in determining the spatial extent and preferred location of the MIBA.	
The MIBA will contribute to Urban Sprawl – the Urban Footprint was established to protect high value areas.	The MIBA represents a long term strategic opportunity for the City. A managed expansion of the Urban Footprint to accommodate an appropriately planned MIBA which appropriately addresses constraints and values will not unduly contribute to urban sprawl. If Council makes a decision to proceed with the MIBA, it would do so on the condition that the balance of the STPFGA (i.e. the precincts not intended for urban	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	purposes) is retained within the Regional Landscape and Rural Production Area (RLRPA).	
Other areas (e.g. Brisbane) are better suited for industrial parks.	The Economic Feasibility Assessment prepared by CDM Smith Pty Ltd acknowledged that competitor MIBA precincts within the broader SEQ context were generally more conveniently located with regard to access to the regional transport network, as well as providing higher levels of fibre and public transport connectivity. However, given there is limited scope to establish new precincts within eastern Brisbane (as the Brisbane LGA approaches build-out), CDM Smith confirmed that an opportunity exists in the longer term to establish a MIBA in Redland City that will provide an alternative location for prospective businesses to establish.	No changes required.
The MIBA should be in the Mount Cotton area.	• On 9 October 2019, Council resolved to endorse the spatial extent of the Southern Thornlands Potential Future Growth Area (STPFGA). The study area is bound by Boundary Road in the north, Mount Cotton Road in the west, Eprapah Creek in the south and properties directly adjoining Springacre Road in the east. • Council officers completed the requisite planning investigations, as required by *ShapingSEQ,* with regard to the Council endorsed study area. For this reason, Council did not examine the suitability of Mount Cotton to accommodate a MIBA.	No changes required.
The topography of the area will not be conducive for industrial development. Council should focus its attention on the 12 ha of land available in Capalaba (between Brewer Street and Jones Road).	• On 9 October 2019, Council resolved to endorse the spatial extent of the Southern Thornlands Potential Future Growth Area (STPFGA). The study area is bound by Boundary Road in the north, Mount Cotton Road in the west, Eprapah Creek in the south and properties directly adjoining Springacre Road in the east. • Council officers completed the requisite planning investigations, as required by *ShapingSEQ,* with regard to the	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	Council endorsed study area. For this reason, Council did not examine the suitability of land within Capalaba to accommodate a MIBA. • CDM Smith Pty Ltd was engaged to prepare an Economic Feasibility to examine the economic viability of establishing employment generating uses in the STFPGA. The assessment found that it would be feasible for a single developer to develop land within the STPFGA to accommodate MIBA uses in a low interest rate environment, based on conservative assumptions, including a 20-year project life. This analysis was informed by the STPFGA planning report, which included a consideration of the topography across the study area. • While the CDM Smith industrial land supply review found that Redland City has sufficient zoned industrial land to meet the minimum requirement of 15 years supply, it also noted that a need exists for approximately 11.9 hectares of industrial allotments within Redland City to 2041, based on its 'alternative scenario' assessment. In due course, Council may seek to consider the suitability of the land between Brewer Street and Jones Road in Capalaba to address this potential future supply shortfall.	
Other		
Local community services are needed to cater for small lot housing development around Kinross Road, including medical, schools, fuel and supermarkets. Mixed uses would benefit the area, as residents currently travel 10 minutes to obtain groceries.	The preferred future land use intents for the STPFGA are not intended to accommodate uses such as medical centres, service stations and full-line supermarkets. However, it is noted that in 2015, Council approved a development permit for Nerinda Pty Ltd on the corner of Boundary Road and Panorama Drive, including a preliminary approval for a material change of use to the site. The application was for a mixed use development which included amongst other things a shopping centre, specialty shops and a service station. This will address the needs of Kinross road residents and broader community in this part of City.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Residential/townhouse style development would be better suited in the area to capitalise on: • Panoramic views to the bay and islands. • Proximity to Sheldon College. • The central location. • The carrying capacity of Boundary Road. The area would also be suitable for a residential mixed use hybrid. The area should be amended to Urban Footprint, zoned as emerging urban community and form part of a master planned residential development.	As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data for 2020, supplied by the Queensland Government to Council, indicates that this position remains unchanged. Council is however proposing to allow limited subdivision to create unsewered lots a minimum of 1 hectare in size in the Rural Residential Precinct.	No changes required.
Council has not consulted with landowners, as directed by the State Government.	On 23 July 2020, the Minister for Infrastructure and Planning wrote to Council advising that a Ministerial Direction had been issued under section 26 of the *Planning Act 2016.* In the letter, Council was instructed to write to landowners within the STPFGA and hold a forum between 31 July 2020 and 11 August 2020. In subsequent correspondence provided by Council to the Planning Minister on 29 July 2020, Council advised that as the STPFGA was of strategic importance to the City, undertaking a city-wide consultation process would be preferable. On 16 September 2020, Council formalised this position by resolving to publicly consult on the preferred future land use intents for the STPFGA, commencing 28 September 2020. The consultation period, which ran until 20 November (39 business days), provided all community members with the opportunity to make a	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	submission on the preferred future land use intents for the STPFGA.	
Landowners should have more of a say, as they are the most affected by the proposals.	Council acknowledges that some landowners within the STPFGA would like additional weight to be given to their submissions. However, Council will consider all submissions equally and base its decision-making on the merit of planning matters raised in those submissions.	No changes required.
Precinct: Intensive Horticulture		
Theme: Traffic		
The network is not designed to handle large volumes/ increased traffic flow in the area.	As outlined in attachment 4 (as amended) to the 16 September 2020 Council Report, the Intensive Horticulture Precinct is intended to accommodate nurseries, lifestyle horticulture and intensive fruit and vegetable production. This land use intent is consistent with existing provisions within City Plan. Any development proposed in the precinct would need to comply with relevant assessment provisions within the City Plan, such as those contained within the Transport, Servicing, Access and Parking Code. This code seeks to ensure that the safety and efficiency of the movement network is maintained.	No changes required.
Theme: Environment		
We need to look at better ways to protect the natural environment. Intensive horticultural practices are not good for the country.	Intensive horticulture is a defined use under Schedule 24 of the *Planning Regulation 2017* and includes the intensive production of plants carried out indoors on imported media or outside using artificial lights or containers. In this regard, it is possible for intensive horticultural practices to be undertaken in a way that increases the efficient use of resources and yields while at the same time decreasing waste outputs that would otherwise cause damage to the environment. When compared against traditional farming practices, intensive horticulture can have many advantages including: reduced water usage, less growing space, faster plant growth, higher yields, less fertiliser (and thus less	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	runoff) and reduced reliance on pesticides and herbicides. These attributes can ensure food production is undertaken in a way that reduces impact on the natural environment.	
Expansion of horticulture in the area will remove havens for wildlife.	The STPFGA planning report (the report) acknowledges that the STPFGA contains important values that are worthy of protecting, including Matters of State Environmental Significance and higher order wildlife corridors. The report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. While Council envisions that higher intensity development will occur in certain parts of the STPFGA over time, it is Council's intent to strike a balance between facilitating development and protecting important values in the area. For clarification, although the entire STPFGA has been assigned a precinct, this does not mean that each precinct will be 'fully developed'. Rather, parts of the sites will be undevelopable because they contain a constraint or value that needs to be addressed/ protected. If Council decides to proceed with a major amendment to City Plan, an additional public consultation period will take place following completion of the first State Interest Review period. At this time, the community will have an opportunity to review, in greater detail, the proposed amendments and how important features in the STPFGA will be protected.	No changes required.
Council has not undertaken an environmental impact study as part of the investigations.	Prior to identifying preferred future land use intents for the STPFGA, Council officers undertook a planning assessment to examine values and constraints across the study area. The analysis included a consideration of wildlife corridors (as per Council's Wildlife Connections Plan 2018 – 2028) and	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	environmental values such as Matters of State Environmental Significance (MSES), which included core koala habitat areas. The planning report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development.	
Development in the precinct will fragment remaining areas of habitat.	It is acknowledged that important environmental values exist across each of the land use precincts in the STPFGA. Although the entire STPFGA has been assigned a precinct, this does not mean that each precinct will be 'fully developed'. Rather, parts of the sites will be undevelopable because they contain a constraint or value that needs to be addressed/ protected. As is currently the case, any development proposed in the STPFGA will be assessed against the relevant provisions within City Plan. This would include the Environmental Significance Overlay (ESO) code, which contains provisions that seek to avoid, minimise and mitigate the significant impacts of development.	No changes required.
Concerns about impacts on Eprapah Creek: • Intensive agricultural activities should not be supported so close to an environmentally sensitive creek that is already struggling from nutrient influx and suspended solids from existing low intensity rural uses. Rules and regulations are ineffective in preventing further damage to the creek. • The horticulture precinct should protect the Eprapah Creek catchment.	These properties are currently located in the Rural Zone. In this regard, level of assessment for rural uses such as animal husbandry, wholesale nurseries and intensive horticulture is intended to remain unchanged. To protect important environmental values in the area, including Eprapah Creek, the majority of uses in the Rural Zone are code assessable; requiring assessment against the relevant assessment provisions including the Rural Zone code, overlay codes and Healthy Waters code. The purpose of the Healthy Waters code is to be achieved through the following outcomes (amongst others):	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Fertiliser and surface water runoff will contaminate Eprapah creek and Moreton Bay industrial activity will discharge large amounts of nitrates into a high value asset – Eprapah Creek. This will reduce water quality in the creek system.	• the environmental values of the city's waterways are protected or enhanced; • stormwater run-off does not adversely impact on the quality of receiving waters, including waterways, wetlands and Moreton Bay.	
Theme: Amenity Impacts		
Concerns about impacts on adjoining landowners: • Pesticides and spray drift will impact on the creek and surrounding homes. • Adverse amenity impacts (dust, noise etc.) do not take into account the current landowners right to enjoy their land, and are not compatible with surrounding residential and educational land uses.	These properties are currently located in the Rural Zone. In this regard, level of assessment for rural uses such as animal husbandry, wholesale nurseries and intensive horticulture is intended to remain unchanged. Within the Rural Zone, the majority of uses are code assessable; requiring assessment against the relevant assessment provisions including the Rural Zone and relevant overlay codes.	No changes required.
Theme: Economics and production		
General concerns about viability and land suitability: • This area does not contain good quality agricultural land. • This land is not suitable for horticulture. • If this type of farming was viable, farmers would be doing it already	Intensive horticulture is a defined used under Schedule 24 of the *Planning Regulation 2017* and includes the intensive production of plants carried out indoors on imported media or outside using artificial lights or containers. In this regard, the type of soil present in the STPFGA is not necessarily a decisive factor as to whether intensive horticultural operations could be successfully conducted, as hydroponics for example enables plants to be grown without soil. In the Economic Feasibility Assessment, CDM Smith notes that the practice 'allows farmers to grow saleable	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• It would not be viable for intensive horticultural businesses to establish in this area. • Extensive earthworks and land prices for the area would make this use unviable. • Farming of this type is not viable. • The topography is not suitable.	crops on small lots in marginal, water-deficient areas where traditional cropping or intensive cropping is not viable'. It is acknowledged that while certain intensive horticultural practices may not be viable currently, the industry is likely to evolve over time due to further research and technological developments. The perceived high costs of obtaining or modifying land are therefore not considered valid reasons to discount the potential for this use to become viable in the future; a use which the Rural Zone seeks to accommodate.	
Water is too expensive to make this land use viable.	While traditional agricultural practices can be water intensive, emerging technologies in the intensive horticultural field are enabling agricultural production to occur with significantly reduced water usage. Intensive horticulture can have a number of other advantages including: less growing space, faster plant growth, higher yields, less fertiliser (and thus less runoff) and reduced reliance on pesticides and herbicides. It is acknowledged that while certain intensive horticultural practices may not be viable currently, the industry is likely to experience significant growth over time. Future growth will be driven by a number of factors including research and technological developments (e.g. precision irrigation, robotics, internet of thing (IoT) connectivity and advanced monitoring), population growth, societal shifts towards consumption of higher percentages of fresh food and consumer demands (e.g. concerns around sustainability, ethical production, food miles etc.).	No changes required.
The focus should be on nutrient rich foods – not bulk production with an emphasis on profits to the detriment of food quality.	Noted as a general comment on the Intensive Horticulture Precinct.	No changes required.
Theme: Location		

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Horticulture should not be supported in a single location. Redland's character, which includes villages within a rural setting, should be re-established. The farm at Wellington Point is a great example.	On the mainland, the vast majority of properties outside the Urban Footprint are zoned Rural. In the Rural Zone, intensive horticulture is a code assessable use (excluding mushroom farms). In this regard, intensive horticulture is a supported use across a large part of the city including the STPFGA.	No changes required.
Shoreline would have been a more appropriate location to establish an intensive horticulture precinct.	Noted as a general comment on the Intensive Horticulture Precinct.	No changes required.
Theme: Miscellaneous		
Brisbane has enough flower farms. This is a waste of good quality land.	Council documents referenced flower farming as one type of intensive horticultural practice that landowners could choose to pursue on their land. Landowners retain discretion to make decisions on the specific land uses they intend to undertake on their land.	No changes required.
Establishing a Horticulture Precinct within a Rural Enterprise Precinct does not meet the intentions of a Rural Enterprise Precinct per ShapingSEQ Rural Precincts Guideline because the intended use must ensure that the activity does not result in soil degradation, impacts on water resource catchments, air pollution, or adverse amenity and noise impacts for nearby residents.	In section 3.2.1, the *ShapingSEQ* Rural precincts guideline states that the matters aforementioned should be considered by the State Government and Local Government in proposing a rural enterprise precinct.	No changes required.
The Intensive Horticulture Precinct should be included in the Rural Residential Precinct.	This comment is noted as a preference to expand the spatial extent of the rural residential precinct.	No changes required.
General support: • Redlands is a fantastic place for growing food. • Supports business and employment. • The precinct will create local jobs and food security.	Noted as general support for the Intensive Horticulture Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• It will help diversify the economy. • Redlands has a strong agricultural heritage that should be maintained • This use is consistent with existing uses in the area. • Farms have already operated here successfully, so new businesses could be approved easily. • Land size would support establishment of buffers to adjacent land uses. • Support for secure food supply chain via local production. • These uses will have a low environmental impact. • Farmers will be encouraged to stay in the area and sell their products locally. • It is important to keep the heritage of the area from a horticultural point of view. Our family loves buying direct from farmers rather than supermarkets. • Preference to retain the rural character of the area. • Supporting horticulture may enable bushland to be retained and serve as corridors for wildlife such as koalas. This could bring tourism dollars for the Redlands.		
General opposition:	Noted as general opposition to the Intensive Horticulture precinct.	Change the name of the Intensive Horticulture Precinct to Rural

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Would like to see the State Government takeover planning for the area. • Not all soil in the Redlands is suitable for farming. • There is limited water available in this locality. • Objection to changing the zoning of the land. • This precinct allows what is already able to be undertaken in the Rural Zone. • This land would be better suited for rural residential development. • This land should be future urban. • Retain the current zoning. • The City has a reputation for being 'Clean and Green' – these values are not being upheld. • This area floods adjacent to Eprapah Creek. • Environmental areas should be conserved for wildlife, including koalas.	Officers agree that the Intensive Horticulture Precinct essentially reflects the nature of already existing uses and that the existing zone intent is to remain unchanged. On this basis, the precinct should be renamed as the 'Rural Precinct' to ensure the name more accurately reflects its preferred future land use intent.	Precinct in the preferred future land use map.
Precinct: Education, Training and Recreation		
Theme: Environmental		
The uses are incompatible with large areas of MSES and MLES – educational buildings prevail over environmental significance and recreational use degrades protected areas over time.	Prior to identifying the preferred future land use intents for the STPFGA, Council prepared the STPFGA Planning Report and Appendices to identify important environmental values and constraints across the study area. The preferred future land use map that was released for public consultation seeks to balance development with the protection of important environmental	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	features, including Matters of State Environmental Significance and riparian vegetation. If Council is decides to proceed with a major amendment to the City Plan to give effect to its preferred future land use intents, the relevant provisions within the planning scheme will continue to apply to all development within this precinct, such as private educational establishments. Most notably, this would include provisions within the Environmental Significance Overlay code.	
Theme: general support/opposition		
General support: • Access to high quality education is important • Redland City desperately need a university – we are the only City in SEQ without one • Supports the use but is concerned about the protection of Hilliards Creek and bushland areas. • The area could become like Griffith University (Toohey Forest) – an area for environmental studies and a tourist drawcard. • It is important to have education and training facilities so students don't have to leave the Redlands for this purpose. • Redlands needs more education facilities to support population growth. • These types of uses attract people to the Redland to spend money	Noted as general support for the Education, Training and Recreation Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• High quality education facilities can put Redlands on the world stage • This zoning should be embraced across all the land on the western side of Taylor road and Woodlands Drive • Will create more jobs for teachers • Conversion of the greenfield sites to recreation focused parks and community land is a perfect fit for this area given its cross-roads location • it will put Redland city on the map as a centre of excellence for education and production of future leaders • would enable students to move from Sheldon College to tertiary education		
General opposition: • Would like to see the State Government take-over planning for the area • This area of land should be utilised for a large scale sports and recreation park inclusive of purpose built equestrian centre and pony club facilities. • This land will remain undeveloped for years to come, due to the shift away from physical campuses to online learning.	Noted as general opposition to the Education, Training and Recreation Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• The tertiary sector is currently struggling and making huge cuts and existing universities are fighting to make ends meet • The bushland in the area should be preserved		
Theme: Traffic		
• Until the roads and intersections are properly upgraded there should be no more expansion in the area. • The area will not be able to cope with increased traffic loads.	As outlined in Attachment 4 (as amended) to the 16 September 2020 Council Report, the Education, Training and Research Precinct is intended to accommodate tertiary education and training facilities, recreation facilities and ancillary accommodation and services. This land use intent is consistent with the existing commentary provided in the Strategic Framework of City Plan (Section 3.4.1.10). In this regard, Council is simply clarifying the spatial extent of the area being referenced in the Strategic Framework of City Plan. Any development proposal to expand uses in the precinct (e.g. education facilities), would need to comply with relevant assessment provisions within the City Plan, such as those contained within the Transport, Servicing, Access and Parking Code. This code seeks to ensure that the safety and efficiency of the movement network is maintained.	No changes required.
Increased traffic due to existing education facilities is resulting in increased wildlife deaths	Noted as a general concern.	No changes required.
Theme: Supporting land uses		
Support for higher density residential development to occur in the STPFGA: • This area should include housing for families and student accommodation as well.	As outlined in the STPFGA Planning Report, it is Council's view that there is already a sufficient quantum of appropriately zoned land within the Urban Footprint to accommodate future population growth to 2041.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• If Council is going to allow a university here, it would make sense to enable residential development around it.		
The accommodation style developments that follow will see a decrease in the liveability of the region.	Noted as a general concern. In advising the Planning Minister of Council's preferred future land use intents for the STPFGA, in an information package supplied on 25 September 2020, Council advised that it 'does not support the expansion of the Urban Footprint to accommodate urban residential development in the STPFGA.' This demonstrates that Council's position aligns with that of the submitter.	No changes required.
The 155 ha land area allocated for this purpose is too large. A portion of this land area should be allocated to form part of a new (MIBA) Precinct adjoining both the Transport Uses Precinct (Yellow Zone) and Storage and Larger Scale Home Based Enterprise Precinct (Purple Zone). This would allow all commercial-industrial activities to be incorporated into one specific area.	The proposal to expand the MIBA Precinct is noted. In developing the preferred future land use intent map, Council relied upon information provided in the CDM Smith Report, which noted that 'an allowance of 50 hectares of allotments (translating to the identification of approximately 100 hectares of raw land) for MIBA uses allows for enough scale to assist in ensuring the development of the precinct is financially feasible to a prospective developer.'	No changes required.
The description of land use intents is insufficient – there is not enough information to make an informed decision.	Council provided a high level overview of the preferred future land use intents in Attachment 4 of the 16 September 2020 Council Report. The reason this approach was used is that Council first wanted to gain an understanding of the community's general support/opposition for the proposed future land use intents before committing officer resources to preparing the proposed future amendment.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. It is at this point time that the community would have further opportunity to review and provide feedback on more specific details about the proposed amendments.	
Large tracts of land have been randomly identified without any attempt to integrate land use outcomes, without rigorous technical investigation and without any economic validity assessment having been undertaken. It is also the identification of private land for public use outcomes without any discussion on how this will affect the current land owners.	The preferred future land use intents were informed by the STPFGA Planning Report, as well as the CDM Smith Economic Feasibility Assessment (EFA) and Industrial Land Supply Review (ILS). The EFA found that it would be feasible for a developer to develop land within the STPFGA to accommodate MIBA uses using conservative assumptions. Project costs, including land acquisition costs, were considered as part of this assessment, however it is acknowledged that a developer would be unlikely to pursue such a project unless a sufficient quantum of suitably priced land could be secured deliver an appropriate return on investment. It should also be acknowledged that Council's preferred future land use intents in no way place any obligation on any landowner within the STPFGA to sell their land or pursue an alternative use on their land. This would be a decision of the respective landowners. Furthermore, existing lawful land uses in the STPFGA continue to remain lawful in perpetuity. The concern regarding private land being designated for public uses is contested – rather Council is identifying, in some instances a preferred alternative land use for specific areas across the STPFGA. If Council decides to proceed with a major amendment to City Plan and it eventually takes effect, it will be up to individual landowners to determine if they intend to: • Stay on their land and retain the existing land use on the site; or	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• Stay on their land and pursue an alternative land use on their site; or • Sell their land.	
Precinct: Transport Uses		
Theme: Traffic		
Concerns about infrastructure capacity, safety and congestion: • Roads would need to be upgraded/widened to support these uses. • This will have severe impacts on traffic along a network that Council has no ability to maintain or upgrade. • This type of development will exacerbate congestion. • Rad safety may be a concern, if buses and trucks are pulling out onto the road at certain times of the day	The Transport Uses Precinct is comprised of 7 allotments with a frontage to the state controlled Mount Cotton Road. If Council decides to proceed with a major amendment to City Plan, as part of the State Interest Review process, the relevant internal departments within the Queensland Government (including the Department of Transport and Main Roads) will be asked to review the amendment proposals and provide comment. This review would include a consideration of any upgrades required to the State road network.	No changes required.
If this facility is required, it should be located on a major road. Residents of this area should be further consulted.	Noted as a general comment. The Transport Uses Precinct is comprised of 7 allotments with a frontage to the state controlled Mount Cotton Road.	No changes required.
Direct traffic away from the residential and school areas	Noted as a general comment.	No changes required.
Theme: Environment		
Development will fragment habitat and reduce populations of wildlife	Council acknowledges the need to protect environmental values in the STPFGA. The preferred future land use map that was released for public consultation seeks to balance development with the protection of important environmental features, including Matters of State Environmental Significance (contains koala habitat) and riparian vegetation.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	It should be understood that while nominal precinct boundaries have been identified, precincts are not intended developed in their entirety. In this regard, each precinct will also need to need to accommodate and account for elements such as infrastructure, important environmental areas, environmental corridors, flood prone areas etc. Regardless of whether or not Council decides to proceed with a major amendment to City Plan, provisions within City Plan, including those within the Environmental Significance Overlay (ESO) Code, will continue to apply to assessable development. The ESO code contains provisions that seek to avoid, minimise and mitigate the significant impacts of development.	
General support: • Supports business and employment • Depots, parking and logistic areas for transport are lacking in Redlands • It's got to go somewhere • We need places for heavy vehicles to park that is away from other industrial and residential sites. This area looks ideal, with easy access to major arterial roads. • As a lot of transport vehicles are being parked on side streets or in commercial estates • This area is already on an arterial road – it won't make a huge difference	Noted as general support for the Transport Uses Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Avoids trucks being parked in residential areas • There is not enough parking hardstand for commercial vehicles in the Redlands especially somewhere that is close to Main Arterial roads. Most vehicle operators only need parking facilities without having to rent buildings and be in the middle of Capalaba or Cleveland Business District.		
General opposition: • The zoning would legitimise what has been illegal use of the area for many years • This land should remain rural residential. • There are much better locations for this near the Brisbane Port • There will never be such a large demand for this type of use in the Redlands • This area adjoins important wildlife areas that would be adversely impacted	Noted as general opposition to the Transport Uses Precinct.	No changes required.
Theme: Miscellaneous		
This use needs to be located in the Urban Footprint	Council has proposed to the State Government that if this land use is supported, it should be included in the Urban Footprint. Further information on Council's preferred amendments to City Plan and *ShapingSEQ* are outlined in attachments 4 and 5 of the Council Report dated 16 September 2020.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
If some of the properties are used for this purpose, the others will degrade and succumb to illegal land uses or border line industrial uses.	If Council decides to proceed with a major amendment to City Plan to give effect to its preferred future land use intents, landowners will be required to obtain the necessary approvals and permits to undertake certain land uses on their property. If landowners are suspected of undertaking illegal activities on their property, the community is encouraged to report these matters to Council so that they can be properly investigated.	No changes required.
The Transport Uses Precinct should be co-located with the MIBA precinct	Noted as a general comment regarding the preferred location for land uses within the STPFGA.	No changes required.
Adverse amenity impacts will be caused by heavy vehicle movements and braking.	A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. This can only occur after the proposed amendment has been prepared by Council and approved by the Planning Minister following a State Interest Review process. At this time, the community will have the opportunity to review and provide comment on more specific details about how adverse amenity impacts are to be considered and addressed through the development assessment process.	No changes required.
This will enable landowners within the Transport Uses Precinct to lodge development applications for transport related urban uses, without triggering referral to the State Government. What will be allowable development under 'Transport Uses Precinct'?	Attachment 4 of the Council Report dated 16 September 2020 outlines at a high level the types of transport uses that are intended to be accommodated in this precinct. This includes transport depots and parking stations, which would benefit from direct access to the State Road network. A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. It is at this point time that the community would have an opportunity to review more specific details about proposed amendments, including the levels of assessment and assessment criteria for land uses in this precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
There is no available reticulated wastewater infrastructure which may be a concern if a bus company or transport company was based there and doing repairs and maintenance on-site.	If Council decides to proceed with a major amendment to City Plan to give effect to its preferred future land use intents, assessable development (which may include land uses mentioned) proposing to establish within the STPFGA would still be required to comply with the relevant provisions in City Plan. Depending on the type and scale of development proposed, a facility for the treatment of wastewater may need to be provided on-site.	No changes required.
Precinct: Storage and Larger Scale Home Based Enterprise		
Theme: Traffic		
• This will have severe impacts on traffic along a network that Council has no ability to maintain or upgrade. • This precinct will trigger upgrades to Duncan Road. • Roads will need to be widened to facilitate increased traffic flow • Vehicles entering and exiting this area will cause safety issues	The Storage and Larger Scale Home Based Enterprise Precinct has dual frontages to state controlled Mount Cotton and Duncan Roads. If Council decides to proceed with a major amendment to City Plan, as part of the State Interest Review process, the relevant internal departments within the Queensland Government (including the Department of Transport and Main Roads) will be asked to review the amendment proposals and provide comment. This review will ensure impacts on the state road network are considered, including safety issues and potential upgrade requirements.	No changes required.
Theme: Environment		
Sheds and vehicles storage facilities are incompatible in areas that contain MLES and MSES	Prior to identifying the preferred future land use intents for the STPFGA, Council prepared the STPFGA Planning Report and Appendices to identify important environmental values and constraints across the study area. The preferred future land use map that was released for public consultation seeks to balance development with the protection of important environmental features, including Matters of Local Environmental Significance (MLES), Matters of State Environmental Significance (MSES) and riparian vegetation.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	If Council is decides to proceed with a major amendment to City Plan to give effect to its preferred future land use intents, the relevant provisions within the planning scheme will continue to apply to all development within this precinct. Most notably, this would include provisions within the Environmental Significance Overlay code.	
Vehicle impacts and habitat loss with have significant impacts on the environment. Clearing will result in the fragmentation of habitat and displacement of wildlife.	While Council is intending to support a broader range of land uses within this precinct, existing assessment provisions within City Plan will continue to apply. Currently, operational work involving native vegetation clearing in the Rural Zone is accepted subject to requirements if the lot contains a dwelling house and the cumulative amount of clearing since the commencement of the planning scheme exceeds 2500m2. Where native vegetation clearing will exceed the nominal thresholds within City Plan, a planning approval would be required. The application would be assessed by Council against provisions within the Environmental Significance Overlay code, which amongst other things, seeks to avoid substantial fragmentation of habitat areas.	No changes required.
Wildlife will be adversely impacted by noise, lighting and additional activity	Noted as a general concern about the impacts of development on fauna. For assessable development, provisions within the Environmental Significance Overlay will apply, including the following performance outcome (PO11): • Development minimises potential for disturbance of wildlife as a result of noise, light, vibration or other source.	No changes required.
Theme: Miscellaneous		
General support: • So long as the wider community benefits from the business carried out in this area	Noted as general support for the Storage and Larger Scale Home Based Enterprise Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• If heavy traffic is directed away from residential and education areas • Parking/transport will be important to support the recreation area • Attracting tourism to the area will help bring in revenue and strengthen the community • As long as ecological values are protected • I don't think development of this type will make a huge difference to the area • A facility of this nature is better located on a major road. • Support for small office home office (SOHO) options • We need more work from home businesses as more people will be doing this in the future • Creates employment and business opportunities • More home based business is needed, especially after the pandemic.		
General opposition: • Tree clearing and earthworks would be required to facilitate future uses • Storage is not the best use of the land, this is better located elsewhere	Noted as general opposition to the Storage and Larger Scale Home Based Enterprise Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Larger businesses in this area would generate more traffic and encourage more clearing • This is retrospectively supporting illegal businesses in the area • Don't support tourist parks in the Redlands • Don't think tourist parks will be viable • This lacks market acceptance or demand. 85 ha is excessive. • It will reduce liveability of the region • This is not an efficient use of the land		
The old poultry sheds could be recycled and used for this purpose (storage)	Noted as a general observation.	No changes required.
This area should be reduced in size and form part of the MIBA precinct	The preferred future land use map shows that the Storage and Larger Scale Home Based Enterprise precinct is physically separated from the MIBA precinct. To join the precincts together would require a significant reduction in the size and location of both the Education, Training and Recreation and Rural Residential Precinct. The information provided in the submission is not considered to provide sufficient justification for this proposal.	No changes required.
Increased traffic noise will have adverse amenity impacts (noise, dust, visual) on residents and the rural lifestyle of the area	Provisions within City Plan will continue to apply to new development. These seek to ensure that adverse amenity impacts are reduced to an acceptable or tolerable level. A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. This can only occur after the proposed amendment has been prepared by Council and approved by the Planning Minister	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	following a State Interest Review process. At this time, the community will have the opportunity to review and provide comment on more specific details about how adverse amenity impacts are proposed to be considered and addressed through the development assessment process.	
Further consultation with adjoining residents is required.	The public consultation exercise that ran from 28 September 2020 – 20 November 2020 occurred outside of the formal amendment process. A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following State Interest Review.	No changes required.
This precinct would be best located on properties that contain ex-poultry sheds for use.	Noted as a general comment on the preferred location for the Storage and Larger Scale Home Based Enterprise Precinct.	No changes required.
Provide land use certainty for the remaining approximately eight land owners located on Mt Cotton Rd within the Southern Thornlands Potential Future Growth Area by including them within the Storage and Larger Scale Home Based Enterprise precinct.	This request was made by a single landowner and it is unclear if the position is shared by other landowners within the area. Given the high level of support for the land use precincts Council released for public consultation, no changes are proposed to the spatial extents of the precincts at this time. It is noted that a further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan.	No changes required.
Precinct: Rural Residential		
Theme: Miscellaneous		
Put all of the blocks outside the MIBA into the Urban Footprint.	The submission does not provide a rationale as to why all of the remaining blocks within the STPFGA should be incorporated into the Urban Footprint.	No changes required.
This land is needed for urban residential purposes.	As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data supplied by the Queensland Government for 2020 indicates that this position remains unchanged.	
These houses can't actually be rural because of Council restrictions on animals on each property	Council's Local Law 2 – Animal Management outlines the general requirements for keeping animals on properties across the City. This includes some limitations on the numbers of certain animals required without a permit.	No changes required.
The constraints imposed including size, depth ratios and single driveway lead one to believe that these constraints have been designed to conflict with the majority of the configurations of land designated as Rural Residential Precinct and are deliberate road blocks to complicate potential subdivisions.	Commentary from Attachment 4 to the 16 September 2020 Council Report states that in the Rural Residential Precinct, the intent is to facilitate rural residential development by enabling reconfiguration of lots down to a minimum size of 1ha, where certain performance benchmarks are achieved (e.g. a frontage to depth ratio not exceeding 1:4 and no additional driveway access points are proposed). Excluding properties in the centre of the STPFGA that have, through the court process, been approved for rural-residential style development, there are 53 other allotments in the Rural Residential precinct that are 2 hectares or greater in size. Theoretically, not considering other constraints that may impact on reconfiguration, it may be possible for an additional 182 unsewered allotments, sized 1 hectare or greater to be created from these 53 allotments. Rather than seeking to 'deliberately complicate' the potential future subdivision of these allotments, Council has sought to clarify the key outcomes being sought. These include: • A limited number of new driveway access points;	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• The creation of lots with practical, generally regular shapes; and • Lot sizes that are 1 hectare or greater in size, which are considered to provide a gradual transition from higher density residential development to the east. A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. This can only occur after the proposed amendment has been prepared by Council and approved by the Planning Minister following a State Interest Review process. At this point in time, the community would be provided with a further opportunity to comment on the specific provisions being proposed.	
Support for suburban density residential development: • This area should allow smaller lots (down to 900-1000m2 in size) • This area should be higher density urban residential • Part of this area should for a residential master planned development.	Council does not support the creation of lots that are of a suburban density within the STPFGA. As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data supplied by the Queensland Government for 2020 indicates that this position remains unchanged.	No changes required.
Support for smaller scale rural residential subdivision:	Establishing a minimum lot size of 1 hectare in the Rural Residential Precinct would enable a fairly limited number of additional lots to be created. Excluding properties in the centre of the STPFGA that have, through the court process, been approved	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• Subdivision down to 6000m2 would enable development to fit in with the surrounding land use pattern • I support this but would like to see 1 acre blocks • Subdivision should be allowed down to 1.5 acres to align with the Parc development	for rural-residential style development, there are 53 other allotments in the Rural Residential precinct that are 2 hectares or greater in size. Theoretically, not considering other constraints that may impact on reconfiguration, it may be possible for an additional 182 unsewered allotments, sized 1 hectare or greater to be created from these 53 allotments. The 1 hectare size limit provides for a gradual transition of lot sizes from the STPFGA to the Low Density Residential LDR2 Precinct (minimum lot area 6,000m2) to the east of the study area. Given 88% of respondents supported the proposed inclusion and general location of this precinct (with a minimum lot size of 1 hectare), there does not appear to be a strong basis for reducing nominal subdivision sizes for rural residential allotments to as little as 1 acre.	
I adjoin the MIBA and do not support this use. It will adversely impact on my amenity (views, noises, smells etc.). Council should include the entire area in the MIBA to avoid the impacts on adjoining property owners in the area.	In evaluating land use requirements for the establishment of a MIBA precinct, CDM Smith noted in its Economic Feasibility Assessment (EFA) that 'an allowance of 50 hectares of allotments (translating to the identification of approximately 100 hectares of raw land) for MIBA uses allows for enough scale to assist in ensuring the development of the precinct is financially feasible to a prospective developer.' Although the CDM Smith EFA indicates that a minimum area of 100 hectares of raw land would be required to provide a land area with sufficient scale to feasibly developed, expansion of the MIBA area may improve the relative attractiveness of this area for development. Regarding amenity, Council acknowledges submitter concerns regarding potential impacts of the MIBA on adjoining/nearby landowners. These are valid concerns and would need to be considered as part of detailed structure planning for the area, if	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	Council decides to proceed with a major amendment to City Plan. Planning Scheme Policy 5 – Structure Plan provides an outline of matters to be considered as part of this process, including: • 'Identifying residences…land uses and approvals on the site and surrounding sites' (5.2.2); and • Setting out 'how development interfaces to the surrounding neighbourhood…[and other uses]'. Although it is not possible to pre-empt how this may occur, a common design and layout response would be to establish buffers between land uses.	
General support: • People need larger blocks for lifestyle, family and business • A mixture of housing sizes is needed in the city. • Creates more opportunities for people to own rural real estate • Demand exists and this will be taken up by the market. • It is consistent with the Parc development and would give surrounding landowners equal rights. • This will satisfy desire for larger home sites with an attractive semi-rural environment and strong conservation values. • This keeps with the rural feel of the area.	Noted as general support for the Rural Residential precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
• This would allow people to subdivide without moving from their family home.		
General opposition: • This area should remain unhanged • No more housing until roads, schools and hospitals are upgraded • No more housing estates in the Redlands • It would be an overdevelopment of the area	Noted as general opposition to the Rural Residential precinct.	No changes required.
Theme: General comments		
More consultation with landowners is required. Their opinions and thoughts should account for a lot more, given they will be directly impacted.	A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. This can only occur after the proposed amendment has been prepared by Council and approved by the Planning Minister following a State Interest Review process.	No changes required.
Focus on sustainable and technologically advanced infrastructure (e.g. surf lake). A 'healthy entertainment precinct' would create jobs, attract tourists, and support the community's mental health.	Noted as a general comment about preferred future land uses in the STPFGA.	No changes required.
This area has been excluded from the Urban Footprint because of its environmental (inc. koalas), scenic and topographic features/constraints. There needs to be a greater emphasis on environmental protection, rather than focusing on job creation. More koala trees need to be planted.	Prior to identifying preferred future land use intents for the STPFGA, Council officers prepared a planning report to examine values and constraints across the study area. The analysis included a consideration of wildlife corridors (as per Council's Wildlife Connections Plan 2018 – 2028) and environmental values such as Matters of State Environmental Significance (MSES), which includes core koala habitat areas.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
The plan needs more land set aside to protect environmental values	The planning report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. Although the entire STPFGA has been assigned a precinct, this does not mean that each precinct will be 'fully developed'. Rather, parts of the sites will be undevelopable because they contain a constraint or value that needs to be addressed/ protected. For example, the MIBA precinct is 100 hectares in size but if developed, is intended to provide 50 hectares of allotments. This means that up to 50% of the MIBA is likely to accommodate features including, but not limited to habitat areas, environmental corridors and flood impacted areas. If Council decides to proceed with a major amendment to City Plan, the impact of the preferred future land uses on state interests, as reflected in the State Planning Policy, would be considered as part of the State Interest Review process.	
The study area was never shown as being this large – the small asterisk which represented this area was deceiving	The STPFGA is not cadastrally defined in the South East Queensland Regional Plan (ShapingSEQ). In order to provide scope for the requisite planning investigations, on 9 October 2019, Council resolved to endorse the spatial extent of the Southern Thornlands Potential Future Growth Area (STPFGA). The study area is bound by Boundary Road in the north, Mount Cotton Road in the west, Eprapah Creek in the south and properties directly adjoining Springacre Road in the east.	No changes required.
The Regional Plan says of these areas: 'The intent is to protect their future potential, not to promote or support their investigation for urban purposes during the life of ShapingSEQ'.	While commentary on page 49 of ShapingSEQ makes a statement to the effect of that outlined by the submitter, it should also be acknowledged that on page 114 (Chapter 3, Metro Sub-Region), specific commentary states:	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	'Redland City Council is required to investigate this area in the short-term, including its potential as a future employment area. The investigations must determine its appropriate use, with the intent of the area defined, and appropriately reflected in the planning scheme, by the end of 2019'. As acknowledged in previous sections of this report, Council did not meet the timelines identified in *ShapingSEQ* due to a decision to finalise the Rural Enterprise Industry Sector Plan. This decision ultimately resulted in a Ministerial Direction being issued by the Planning Minister on 23 July 2020. The Ministerial Direction clarified that Council was required to fulfil its obligations under ShapingSEQ in the short term. Officers are of the opinion that its actions to date have satisfied the general requirements of the Ministerial Direction and further consultation with the State Government will occur if Council decides to proceed with a major amendment to City Plan.	
Infrastructure investment needs to occur first (e.g. sufficient water supply).	The rationale behind identifying a preferred future land use intent for the STPFGA is firstly to confirm that the general intent, location and size of the precincts is appropriate, having regard to values and constraints across the study area as well as development feasibility. If Council decides to proceed with a major amendment to City Plan to give effect to its preferred future land use intents, including for example the MIBA precinct, detailed structure planning would need to be undertaken, which would involve amongst other things, a consideration of future infrastructure requirements and requisite upgrades to the relevant networks.	No changes required.
RCC has not complied with ShapingSEQ Outcome 14 sub-regional direction to investigate STPFGA for potential urban use,	As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
as per the definition, including but not limited to urban outcomes (including residential) in the short term. Council is refusing to comply with the Ministerial Direction to carry out a proper assessment of this area (including a consideration of residential outcomes) and this is unreasonable. Redland City Council has failed to comply with the State Government Ministerial Directive to satisfy its obligations under *ShapingSEQ*	within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data supplied by the Queensland Government for 2020 indicates that this position remains unchanged. To clarify, it is acknowledged that the sub-regional directive being referenced does not preclude Council from considering the suitability of the STPFGA to accommodate suburban density residential development. However, for the reasons mentioned above, Council is of the position that this land is not needed for residential purposes to 2041. Regarding timing, Council made a decision to finalise the Rural Enterprise Industry Sector Plan before undertaking the requisite investigations outlined in *ShapingSEQ*. The background investigations have now been completed in accordance with the requirements of *ShapingSEQ* and the Ministerial Direction notice received by Council on 23 July 2020.	
The scenic amenity assessment is inadequate – it assesses the outlook from one location only (Sirromet Winery)	Section 5.16 'Visual Analysis' of the STPFGA Planning Report acknowledges that that Redlands' landscapes and landforms provide a high level of scenic amenity, contribute to local character and identity and are of cultural significance. The analysis undertaken as part of this section makes reference to vantage points from Sirromet Winery as well as 'Mount Cotton Road and	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	Woodlands Drive [when] looking across Eprapah Creek and east to Moreton Bay'. Other visually prominent areas, including high points within the centre of the study area and the vegetated allotment on the south eastern corner of the Boundary Road / Woodlands Drive intersection are also referenced in this section. The analysis notes that any future development within the STPFGA should be undertaken in a sensitive manner to maintain the transition between the between the Regional Landscape and Rural Production Area (south and west) and the Urban Footprint (north and east).	
The STPFGA planning report states that 'Newly approved subdivisions within the PFGA, at 84-122 Taylor Road and 157-197 Woodlands Drive that comprise an additional 67 allotments, will be serviced by on-site sewer treatment. These development applications did not give any consideration to the possibility to connect to Council's reticulation infrastructure." This statement is false.	Officers acknowledge that this statement is incorrect. As noted by the submitter, this information has been made available in Planning and Environmental Court appeal documents (Item 45, case 2675 of 2009).	The STPFGA planning report will be updated to reflect the information provided in the submission.
Significant environmental benefits could be delivered by creating and rehabilitating environmental corridors on private land with legal protections. This would provide improve visual amenity for new uses establishing in the area.	Potential future redevelopment within the STPFGA also presents an opportunity to facilitate protection and enhancement of environmental values. If Council decides to proceed with a major amendment to City Plan, provisions within the planning scheme will seek to balance the impacts of new development against the environmental outcomes being sought. For example, there is a sub-section within the Environmental Significance Overlay that specifically relates to 'Corridors and Enhancement Plantings' – see Performance and Acceptable Outcomes 13-17.	No changes required.
Rural residential development is greatly needed for the future of the city. Council	As outlined in previous sections of this report, Council believes that there is sufficient land within the Urban Footprint to	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
have completely ignored the need for urban residential land uses.	accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program.	
Residents impacted by the proposed changes should be involved in further consultation.	If Council decides to proceed with a major amendment to City Plan, an additional public consultation period will take place following completion of the first State Interest Review period.	No changes required.
Rural residential development will protect the environmental and amenity values of the area, while supporting local businesses. However, commercial development will adversely impact on lifestyle values of the area.	Noted as general support for the Rural Residential Precinct and general opposition to the Mixed Industry Business Area (MIBA) Precinct.	No changes required.
This area has a lot of potential. The land could be used for housing (including low and medium density residential), educational facilities, retirement villages, businesses and parks. The area should be a master planned residential development.	As outlined in previous sections of this report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. For this reason, Council did not consider the suitability of the STPFGA to accommodate 'suburban scale' residential development. As outlined in Attachment 4 (as amended) of the 16 September 2020 Council Report: • Educational uses would be supported in the Education, Training and Recreation Precinct. • Business expansion would be supported across a number of precincts including the Mixed Industry Business Area (MIBA), Transport Uses and Storage & Larger Scale Home Based Enterprise Precincts. The provision of park and community infrastructure in the area will ultimately be determined by future land uses that are realised in the STPFGA. If Council decides to proceed with a major	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	amendment to City Plan, future detailed structure planning of the MIBA precinct for example, would need to occur to account for factors such as: • '(g) how and where infrastructure is to be provided such as water, sewerage, stormwater and community infrastructure; (h) the proposed open space network' (Planning Scheme Policy 5 – Structure Plans).	
There are no service stations or small shopping precincts in Thornlands. These would be beneficial landowners within the STPFGA and newly developing areas.	In 2015, Council approved a development permit for Nerinda Pty Ltd on the corner of Boundary Road and Panorama Drive, including a preliminary approval for a material change of use to the site. The application was for a mixed use development which included amongst other things a shopping centre and service station. Although this application has been the subject of numerous legal proceedings, on August 28 2020, the Supreme Court of Appeal dismissed the matter. It is understood the landowners are now looking to move forward with the development proposal. Although Council is not responsible for the delivery of development on private property, the abovementioned approval would seemingly indicate that in the short-medium term, the facilities being sought will be delivered in the area. This would provide benefits in the form of additional shopping opportunities to landowners within the STPFGA.	No changes required.
Council had at least two years to formalize an STPFGA plan, in which time there was no consultation with property owners and residents to gauge their wishes as to what happens in their neighbourhood.	Council provided a high level overview of the preferred future land use intents in Attachment 4 of the 16 September 2020 Council Report and commenced public consultation on 28 September 2020. The reason Council released the preferred land use intent map and supporting information was that it first wanted to gain an understanding of the community's general support/opposition for	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	the proposed future land use intents before committing significant officer resources to preparing the proposed future amendment. A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. It is at this point time that the community would have further opportunity to review and provide feedback on more specific details about the proposed amendments.	
A lot of the proposed uses for this land are already allowed under the existing City Plan and Council has the ability to determine any application on the individual merits of the proposal. Consequently, there is no need to rezone the land.	Notes as a general comment.	No changes required.
The MIBA precinct should be expanded: - through to the corner of Boundary Road and Taylor Road - to take in the education, transport and larger scale home based business precincts	Council's preferred location and spatial extent for the MIBA precinct, as reflected in the preferred future land use map, was informed by work undertaken by CDM Smith as part of its Economic Feasibility Assessment (EFA). The EFA states that 'an allowance of 50 hectares of allotments (translating to the identification of 100 hectares of raw land) for MIBA uses allows for enough scale to assist in ensuring the development of the precinct is financially feasible to a prospective developer'. The information provided in the submission did not provide a strong planning rationale to justify increasing the spatial extent of the MIBA precinct.	No changes required.
Lower order uses such as storage and transport are not appropriate in the STPFGA.	Noted as general opposition to the Transport Uses and Storage & Larger Scale Home Based Enterprise Precincts.	No changes required.
The plan is inequitable in its current form. The Intensive Horticulture Precinct should	Noted as general opposition to the Intensive Horticulture Precinct and support for expanding the spatial extend of the Rural Residential Precinct.	No changes required.

Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
be removed and incorporated into the rural residential precinct.		

Feedback on land use precincts – Individual submissions

This section analyses the feedback provided by individuals/entities that provided a tailor-made submission to Council. It aggregates feedback from the 12 individual submissions. Each individual/entity that made a submission has been allocated a submitter ID # to enable them to better understand how Council considered the matters raised in their submissions.

Table 3: Grounds of submissions and how Council has considered and dealt with each submission – Individual submissions

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Precinct: Mixed Industry Business Area (MIBA)			
4, 8, 9, 10, 11	Objection to a MIBA: • The report refers to development of a MIBA over the long term whereas the minister required urban land to be identified in the short term. • The MIBA precinct should be removed as Council has previously reported that there is sufficient industry land for the next 15 years. • There is a diminished demand for industrial land and existing space should be exhausted first, including within the German Church Road industrial area where uptake has been slow. • The MIBA precinct isn't specific enough.	• The Minister did not require urban land to be identified in the short term. The Ministerial direction, dated 23 July 2020, directed Council to complete the investigation(s) required by the South East Queensland Regional Plan (*ShapingSEQ)*. The commentary contained in Chapter 3, Part C: Sub-regional directions (p.114) of *ShapingSEQ* makes it clear that Council is required to investigate this area, determine its appropriate use and make any changes, if required, to its planning scheme in the short term. There is no obligation on Council to identify this land as 'Urban' by including all or parts of the STPFGA in the Urban Footprint. • As outlined by CDM Smith in the Economic Feasibility Assessment, the delivery of a MIBA should ideally be facilitated in the longer term (~15years) so as to not compromise commercial office take up in the Capalaba and Cleveland principal activity centres in the short term. This timeframe also recognises that significant capacity exists within competitor MIBA precincts in the region to accommodate growth within the short to medium term. However, given there is limited scope to establish new precincts within	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• Concerns that Hilliards Creek cannot be protected from MIBA uses. • The slopes towards Boundary Road are steep and a great deal of cut and fill would be required affecting the sources of Hilliards Creek. • Access to the precinct would be difficult because of slope and DTMR not permitting access onto main roads.	eastern Brisbane (as the Brisbane LGA approaches build-out), CDM Smith confirmed that an opportunity exists in the longer term to establish a MIBA in Redland City that will provide an alternative location for prospective businesses to establish. • Council provided a high level overview of the precinct intents and preferred future land uses in Attachment 4 of the 16 September 2020 Council Report, which is available on the STPFGA web page. • It should be understood that while nominal precinct boundaries have been identified, precincts are not intended developed in their entirety. For example, the CDM Smith report acknowledges that the ~100ha MIBA Precinct will comprise approximately 50ha of MIBA lots, with the balance area used to accommodate important environmental areas, environmental corridors, flood prone areas etc. • Section 10 of the CDM Smith EFA contains an Indicative Feasibility Assessment. The analysis contained in this section of the report was used to inform the size and location of the MIBA precinct. The nominal size of the MIBA (100 ha) was chosen because it was demonstrated to be of a sufficient scale to be financially feasible for a prospective developer, using conservative assumptions. The EFA was informed by the planning report which took into account factors such as the topography of the study area. • If Council decides to proceed with a major amendment to City Plan, as part of the State Interest Review process, the relevant internal departments within the Queensland Government (including the Department of Transport and Main Roads) will be	

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
		asked to review the amendment proposals and provide comment. This review would include a consideration of any access requirement and upgrades to the State road network.	
Precinct: Intensive Horticulture			
1, 2, 3, 4, 8, 10, 11	Objection to the Intensive Horticulture Precinct: • Horticultural designation is inefficient as the land is not classified as good quality agricultural land. • The area allocated for this precinct does not consider the amount of land required to support this type of land use. • Combining 7 parcels of land identified for intensive horticulture is unlikely to generate a cost benefit. • Horticultural land, if developed in the designated precinct, without a published environmental impact assessment, will result in a high risk of pollution to Eprapah Creek disregarding the importance of environmental and habitat protection. • Whilst innovative ideas there are downsides to intensive horticulture, including pesticide and fertiliser use	• Intensive horticulture is a defined used under Schedule 24 of the Planning Regulation 2017 and includes the intensive production of plants carried out indoors on imported media or outside using artificial lights or containers. In this regard, the type of soil present in the STPFGA is not necessarily a decisive factor as to whether intensive horticultural operations could be successfully conducted, as hydroponics for example enables plants to be grown without soil. In the Economic Feasibility Assessment, CDM Smith notes that the practice 'allows farmers to grow saleable crops on small lots in marginal, water-deficient areas where traditional cropping or intensive cropping is not viable'. • It is acknowledged that while certain intensive horticultural practices may not be viable currently, the industry is likely to evolve over time due to further research and technological developments. The perceived high costs of obtaining or modifying land are therefore not considered valid reasons to discount the potential for this use to become viable in the future; a use which the Rural Zone seeks to accommodate. • Officers agree that the Intensive Horticulture Precinct essentially reflects the nature of already existing uses and that the existing zone intent is to remain unchanged. On this basis, the precinct	Change the name of the Intensive Horticulture Precinct to Rural Precinct in the preferred future land use map.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	particularly in flower farming (a use indicated in the Redlands Coast Rural Enterprises Industry Sector Plan (RCREISP)), with huge implications on creek and freshwater life – wide buffers and ongoing monitoring will be necessary. • Water use is a weakness in intensive horticulture with a reliance on town water, even in vertical farming although the amount of water may be reduced (depending on scale). • Low impact, rural industry agri-tourism would be more appropriate in the area. • The location of the intensive horticultural precinct, located among existing and proposed residential land and poultry farming is inappropriate and ill-aligned by virtue of noise, odour and air quality concerns (dust, overspray etc). • Horticulture will not be delivered in the proposed area and will be an extension of the view corridor.	should be renamed as the 'Rural Precinct' to ensure the name more accurately reflects its preferred future land use intent. • Council is proposing to retain properties in this locality within the Rural Zone. In this regard, level of assessment for rural uses such as animal husbandry, wholesale nurseries and intensive horticulture is intended to remain unchanged. To protect important environmental values in the area, including Eprapah Creek, many of uses in the Rural Zone are code assessable; requiring assessment against the relevant assessment provisions including the Rural Zone code, overlay codes and Healthy Waters code. The purpose of the Healthy Waters code is to be achieved through the following outcomes (amongst others): o the environmental values of the city's waterways are protected or enhanced; o stormwater run-off does not adversely impact on the quality of receiving waters, including waterways, wetlands and Moreton Bay. • As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program.	

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• The horticultural precinct should be removed from the plan and reallocated to residential land.		
Precinct: Education, Training and Recreation			
1, 2, 5, 6, 7, 10, 11	Objection to the Education, Training and Recreation Precinct: • There is no planning basis for an 'off limits' 100m buffer for further development around Sheldon College. There are many forms of development that would be suitable. • The buffer around Sheldon College does not take into account the nature of its operations in proximity to its boundary, the existing covenants that act as a buffer, and that future development adjoining the college is required to consider reverse amenity principals. • The area contains large patches of MLES and MSES, education precincts generally include continued expansion and incremental removal of valuable habitat. • Recreation uses can lead to significant degradation of vegetation overtime.	• The rationale provided by submitters in questioning the appropriateness of the 100m buffer around the Sheldon College boundary is valid. A more nuanced approach could have accounted for factors such as existing vegetation protected by covenants along the southern and western boundaries of Sheldon College. • Despite this acknowledged shortcoming in the STPFGA Planning Report, one has to consider whether this information would have had a material impact on the preferred future land use intent map adopted by Council on 16 September 2020 or if this information provides justification for changing the spatial extent of the Education, Training and Recreation Precinct. Based on a consideration of likely impacts, the abovementioned matter is not considered a valid reason to change the land use intent or spatial extent of the Education, Training and Recreation Precinct. • Prior to identifying the preferred future land use intents for the STPFGA, Council prepared the STPFGA Planning Report and Appendices to identify important environmental values and constraints across the study area. The preferred future land use map that was released for public consultation seeks to balance development with the protection of important environmental	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• The area may suite an institution that has an environmental focus providing opportunities for education similar to Griffith University campus at Toohey Forest.	features, including Matters of State Environmental Significance and riparian vegetation. • If Council is decides to proceed with a major amendment to City Plan to give effect to its preferred future land use intents, the relevant provisions within the planning scheme will continue to apply to all development within this precinct, such as private educational establishments. Most notably, this would include provisions within the Environmental Significance Overlay code.	
Precinct: Transport Uses			
7, 10, 11	Objection to the Transport Uses Precinct: • Allowing the zoning (transport uses and storage and larger scale home business enterprise precincts) along the whole frontage of Duncan Road and Mt Cotton Road would create a corridor that would be an eyesore and detrimental to tourism prospects. • If permitted to proliferate would lead to reverse amenity concerns prejudicing higher and better land uses in the future. • Purposeful land degradation on properties in this area should not be a reason to rezone it – sends out the wrong message. • The planning report doesn't ground truth the validity of existing/former	• The concerns relating to the potential amenity impacts of future development are acknowledged, however it is noted that provisions can be incorporated within City Plan to ensure amenity impacts are considered as part of the development assessment process. • A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. It is at this point time that the community would have further opportunity to review and provide feedback on more specific details about the proposed amendments, including provisions relating to the protection of amenity. • The planning report is based on a desktop assessment. Due to time and resource constraints, physical inspections of individual properties (other than by road), was not undertaken. If landowners are suspected of undertaking illegal activities on their	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	uses, including the quarry, and question the best use of the surrounding land. • Such land uses should be restricted to a small area in isolated patches, surrounding the quarry.	property, the community is encouraged to report these specific matters to Council so that they can be properly investigated. • Council notes the preference of some submitters to ensure the spatial extent of the Transport Uses Precinct is limited to those sites that are already significantly disturbed and in proximity to the former quarry site.	
Precinct: Storage and Larger Scale Home Based Business			
7, 11	Opposition to the Storage and Larger Scale Home Based Business Precinct: • The area captured by this precinct already contains adhoc, uncontrolled and poorly integrated enterprises often resulting in untidy uses of land and if permitted to proliferate would lead to reverse amenity concerns prejudicing higher and better land uses in the future. • The planning report doesn't ground truth the validity of existing / former land uses. • The uses would include incompatible buildings/sheds that would result in substantial losses of habitat.	• If landowners are suspected of undertaking illegal development/activities on their property, the community is encouraged to report these specific matters to Council so that they can be properly investigated. • The concerns relating to the potential amenity impacts of future development and future vegetation clearing are acknowledged, however it is noted that provisions can be incorporated within City Plan to ensure these impacts are considered as part of the development assessment process. • A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. It is at this point time that the community would have further opportunity to review and provide feedback on more specific details about the proposed amendments, including provisions relating to the protection of amenity and native vegetation clearing thresholds. • The planning report is based on a desktop assessment. Due to time and resource constraints, physical inspections of individual properties (other than by road), was not undertaken.	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
Precinct: Rural Residential			
10, 11	Support the intention of this precinct as opposed to higher density housing which is most damaging to health of creeks - enough land has already been allocated for residential purposes up to 2041.	Noted as general support for the Rural Residential Precinct.	No changes required.
9	The minister directed the Council to remove the rural residential land from the Draft City Plan.	Noted as a general comment. Despite this, Council is able to put its preferred future land use intents to the State Government for consideration as part of a potential future major amendment to City Plan. Council believes that this land use is suitable in the areas nominated and will provide certainty to landowners that have been subject to changing policy decisions for almost 2 decades.	No changes required.
Theme: General comments			
4, 5, 6, 7, 8, 10	General precinct: • The location of the six precincts appear to be randomly identified without any attempt to integrate the land use outcomes. • The application of the precincts appear over prescriptive with a narrow set of outcomes. • There needs to be clear and detailed definitions of each of the precinct types to ensure they are clearly understood.	• Council provided a high level overview of the precinct intents and preferred future land uses in Attachment 4 of the 16 September 2020 Council Report, which is available on the STPFGA web page. The preferred future land use map was released for the first phase of public consultation to gauge the community's general views on the suitability of the land use intents proposed and the spatial extent of each precinct. • The reason this approach was used is that Council first wanted to gain an understanding of the community's general support/opposition for the proposed future land use intents before committing officer resources to preparing the proposed future amendment.	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• There is no indication whether the proposed precincts are viable, economically or otherwise, or deliverable. • It is unacceptable that Council finds the area unsuitable for urban purposes and instead groups the area into precincts. • The balanced area, outside the precincts, will be left underutilised and prejudiced from achieving its highest and best use. • Low impact tourism and ethical agri-businesses would be best suited to incorporate with wildlife/natural assets.	• A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. It is at this point time that the community would have further opportunity to review and provide feedback on more specific details about the proposed amendments. • As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. • To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data for 2020, supplied by the Queensland Government to Council, indicates that this position remains unchanged. • Section 10 of the CDM Smith EFA contains an Indicative Feasibility Assessment. The analysis contained in this section of the report was used to inform the size and location of the MIBA Precinct. The nominal size of the MIBA (100 ha) was chosen because it was demonstrated to be of a sufficient scale to be financially feasible for a prospective developer, using conservative assumptions.	

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
1, 2, 3, 8, 10, 12	• The environmental and scenic amenity values that exist within the study area need to be identified, protected and expanded and embed through statutory planning and other legal means that will stand up in court, carry forward and endure through time. • Safeguard the rural amenity, particularly along Woodlands Drive. • The proposed MIBA should be reconsidered due to impact upon the scenic amenity particularly along Boundary Road. • Visual amenity assessment is inadequate only assessing the outlook from Sirromet Winery. • The proposed precinct plan is targeted approach to protect the view corridor of Sirromet Winery. • MIBA is not the best use of a scenic area that is highly visible, buildings would block views. • The area is quite hilly and it will be shameful to fill the tourist drive up with concrete sheds and colour bond buildings.	• The Southern Thornlands Potential Future Growth Area (STPFGA) planning report recognises that the entire area provides an important interface between the regional landscape and rural production area and the urban footprint. More specifically, section 5.16 'Visual Analysis' of the STPFGA Planning Report acknowledges that that Redlands' landscapes and landforms provide a high level of scenic amenity, contribute to local character and identity and are of cultural significance. The analysis undertaken as part of this section makes reference to vantage points from Sirromet Winery as well as 'Mount Cotton Road and Woodlands Drive [when] looking across Eprapah Creek and east to Moreton Bay'. • Other visually prominent areas, including high points within the centre of the study area and the vegetated allotment on the south eastern corner of the Boundary Road / Woodlands Drive intersection are also referenced in this section. The analysis notes that any future development within the STPFGA should be undertaken in a sensitive manner to maintain the transition between the between the Regional Landscape and Rural Production Area (south and west) and the Urban Footprint (north and east). • For clarification, the MIBA Precinct would be expected to function and accommodate similar uses to other MIBAs in the region, including Metroplex on Gateway and Brisbane Technology Park. Generally speaking, the built form in MIBA areas is of a higher standard than general industry areas, which usually accommodate	No changes required.

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	• Increased development will impact Sirromet Winery and their vision as a rural retreat.	large footprint buildings for the purposes of warehousing, transport, storage and general manufacturing. As noted in Attachment 4 to the 25 September 2020 Council Report, the MIBA Precinct is not intended to have a strong industrial land use focus, but is envisioned to accommodate 'a broad range of commercial and industrial employment opportunities including professional services, higher order industrial uses (e.g. creative industry and advanced manufacturing), education, training and research facilities, information technology and communication services, office services and service trades' (page 1).	
8, 10 , 11, 12	• The City Plan allows as of right removal of bushland within the Rural Residential Precinct which could result in the near annihilation of existing vegetation. Therefore the rural designation should remain to best preserve the habitat and scenic amenity values. • The as of right clearing of protected vegetation, 2,500m2 of MLES and 500m2 of MSES / Koala habitat, over the whole of the FGA would compromise habitat value. • All key habitat areas should be acquired by Council, protected and rehabilitated.	• The presumption that the Rural Residential Precinct would result in the 'annihilation' of vegetation is disputed. Council released the preferred land use intent map and supporting information to gain an understanding of the community's general support/opposition for the proposed future land use intents before committing officer resources to preparing the proposed future amendment. • A further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan. This can only occur after the proposed amendment has been prepared by Council and approved by the Planning Minister following a State Interest Review process. At this point in time, the community would be provided with a further opportunity to comment on the specific provisions being proposed, including those relating to native vegetation clearing. • Council does not intend to purchase all land across the STPFGA with habitat values. Rather, the protection of important habitat	No changes required.

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	• Oblige all land owners to protect, conserve and sustain koala habitat and wildlife corridors. • Mechanisms need to be in place to protect wildlife corridors shown in the wildlife connections plans. • Collector roads within the study area would lead to the destruction of environmental values including an unacceptable amount of MSES and damage to Hilliards Creek. • It is not acceptable to deal with environmental matters at a later stage. • The proposed land uses will cause an accelerated loss of koala habitat and koalas are already on the brink of extinction in the Redlands. • The FGA contains important habitat and movement corridors - the proposed land uses will create barriers to fauna movement. • The persistent reluctance of Council to formally adopted the wildlife corridors plan is disturbing and should be adopted to protect habitat and strengthen linkages.	areas and linkages would be achieved through provisions in the relevant zone and overlay codes. • If Council decides to proceed with a major amendment to City Plan, as part of the State Interest Review process, the relevant internal departments within the Queensland Government (including the Department of Environment and Science) will be asked to review the amendment proposals with regard to the State Planning Policy. This review would include a consideration of any impacts on Matters of State Environmental Significance (MSES). • Prior to identifying preferred future land use intents for the STPFGA, Council officers prepared a planning report to examine values and constraints across the study area. The analysis included a consideration of wildlife corridors (as per Council's Wildlife Connections Plan 2018 – 2028) and environmental values such as Matters of State Environmental Significance (MSES), which includes core koala habitat areas. The planning report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development.	

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• Despite government and Council's spin to protect koalas and retain our character large areas are still being cleared.		
8, 11	• The rural designation should remain, as opposed to Rural Residential Precinct, considering the current reduction in population growth and the likelihood that a rural residential designation will lead to future pressure for further subdivision and increased habitat loss. • Map, protect and rehabilitate all waterways - Future planning provides an opportunity to rehabilitate degrades areas along the edges of Eprapah Creek and Council should undertake land acquisition to enable this to occur. • The rural residential uses will result in an increased runoff and sediments negatively impacting upon Eprapah Creek.	• In the 16 September 2020 Council Report, officers did not recommend proceeding with the Rural Residential Precinct and noted that this land use is 'inconsistent with the outcomes sought by *ShapingSEQ*' (attachment 4, page 4). Despite this, Council's resolution from 16 September 2020 was to retain the Rural Residential Precinct and advertise this during the consultation period in its preferred future land use map. • Prior to identifying preferred future land use intents for the STPFGA, Council officers undertook a planning assessment to examine values and constraints across the study area. The analysis included a consideration of waterway corridors and environmental values such as Matters of State Environmental Significance (MSES), which included core koala habitat areas. The planning report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. • Provisions within City Plan, including the Reconfiguring a Lot Code seek to ensure the design and layout of new subdivisions avoids or reduces adverse environmental impacts. If Council decides to proceed with a major amendment to City Plan, an additional public consultation period will take place following completion of	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
		the first State Interest Review period. At this time, the community will have an opportunity to review, in greater detail, the proposed amendments and how the impacts of potential future development are to be managed.	
1, 2, 3, 5, 6, 7	Support for urban residential development: • The assumption that there is no need for land for residential purposes is incorrect. To not include residential land in the review is contrary to the Ministerial direction to carry out a proper assessment of this area. • The investigation is not a thorough assessment of the area for urban purposes and does not consider the full range of urban uses. • Council minutes from 2013 onwards reveal an entrenched planning intent to exclude the area from urban use. Including not releasing various attachments / reports that informed Council's decisions to the public. • Not considering residential land demonstrates Council's opposition to residential development in this area despite it being common knowledge	• The Ministerial direction, dated 23 July 2020, directed Council to complete the investigation(s) required by the South East Queensland Regional Plan (*ShapingSEQ)*. The commentary contained in Chapter 3, Part C: Sub-regional directions (p.114) of *ShapingSEQ* makes it clear that Council is required to investigate this area, determine its appropriate use and make any changes, if required, to its planning scheme in the short term. There is no obligation on Council to identify this land as 'Urban' by including all or parts of the STPFGA in the Urban Footprint. • As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data supplied by the Queensland Government for 2020 indicates that this position remains unchanged.	No changes required.

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	that there is a shortage of available land. • The area should be zoned emerging community providing a platform from which structure planning can be undertaken and all hypothetical constraints can be diligently assessed and future highest and best use outcomes can be identified. • The area to the east and west of Taylor Road has no real infrastructure constraints and should be supported for urban land uses, to be included within the urban footprint and zoned emerging community. • Other areas in the city, that are far more remote and constrained have been approved for urban development but have not been delivered. • The highest and best use of the STPFGA is a master planned urban community encompassing residential and relevant employment uses and would be highly prized given its close proximity to Brisbane CBD and other centres.	• To clarify, it is acknowledged that the sub-regional directive being referenced does not preclude Council from considering the suitability of the STPFGA to accommodate suburban density residential development. However, for the reasons mentioned above, Council is of the position that this land is not needed for residential purposes to 2041. • In the 2020 UDIA report titled 'The Perfect Storm: SEQ Land Supply', reference is made to there being 2.5 years of approved lot supply in Redland City. In *ShapingSEQ's* 'Measures that matter', a minimum of 4 years approved supply is sought. Officers make note of the following with regard to this claim: ○ Achieving lot approvals is contingent on the actions of two key parties – local government and the private sector. Local government is responsible for ensuring there is a sufficient supply of suitably zoned land and for assessing and deciding development applications. The private sector (generally speaking), is responsible for lodging development applications and developing land. Importantly, local government cannot force landowners to lodge development applications, meaning that outside of assessing and deciding applications, Council's ability to influence the delivery of land 'to market' is limited. ○ Local Government has a target under the regional plan to make sure a minimum of 15 years of appropriately zoned and able-to-serviced land is available to accommodate the population and economic growth forecasts. As outlined in	

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	• The area is in close proximity to essential infrastructure including retail, hospitals, schools and trunk infrastructure which can support residential uses. • Residential land is needed close to schools and employment generating uses. • Employment generation uses can include residential development which Council dismisses as it will not support small lot housing. • Urban development close to the college should be encouraged to contribute to the sustainability of Sheldon College into the future. • Recent approvals highlight the suitability of the wider Taylor Road area for urbanisation with smaller lot sizes. • The project plan ignores UDIA data that reveals there is only 2.5 years of detached dwelling supply in the Redlands. • The 2019 Land Supply and Development Monitoring report	previous sections of this report, through the annual land supply development monitoring reporting undertaken by the State Government, Redland City Council has been able to demonstrate that is has a sufficient quantum of suitably zoned land to accommodate growth for at least the next 15 years. This would appear to demonstrate that it is landowners failing to act on development opportunities, rather than Council having an insufficient supply of suitably zoned land, that is causing a perceived shortfall in lot supply. In this regard, the approved lot supply target is considered to be a poor metric for evaluating land supply constraints in the City. ○ The UDIA report also fails to account for large development areas that are likely to come online in Redland City in the near future, such as the Victoria Point Structure Plan area (up to 1,500 dwellings) and Shoreline (up to 4,000 dwellings). Once development approvals for these areas are obtained, it is expected that Redland City Council will comfortably satisfy the *ShapingSEQ* lot supply targets.	

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	reiterates that there is a reliance on attached dwellings to support accommodation growth which are not a typical dwelling choice for families / Sheldon College families.		
8, 9, 12	Opposition to urban residential development: • Council's position that small lot housing will not occur in the study area is noted and supported, despite some landowners believing up zoning is a presumed right. • There was a huge, and successful, community campaign to remove the Thornlands future growth area from the urban footprint in 2009, this should be upheld. • The government at the time stated that this land will act as a buffer to protect high value koala habitat in the area and in the future can become new koala habitat. • Supports Council's position that the urban footprint should not be expanded to include the FGA.	Noted as general support for Council's decision not to facilitate suburban style residential development within the STPFGA.	No changes required.

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	• The Toondah Harbour and Shoreline development contribute to an oversupply of development.		
4, 6, 10	• The investigation is being used to change regional plan designations to the east of Taylor Road excluding the area from urban use altogether which is a fundamental error since gazetting this area within the RNU in the 2006 RPS when identified in the regional plan as urban footprint. • Supports the reinstatement of the urban footprint to the east of Taylor Road and the extension of the urban footprint to the west of Taylor Road. • The intention of this report is to facilitate change to the regional plan and the objective of removing the area east of Taylor Road from the urban use altogether. • The project plan looks exclusively at the lands potential as a future employment area which does not satisfy outcome 14 of the SEQRP which states 'including its potential as a future growth area'.	• The specific commentary from *ShapingSEQ* (page 114, Chapter 3, Metro Sub-Region), states: 'Redland City Council is required to investigate this area in the short-term, including its potential as a future employment area. The investigations must determine its appropriate use, with the intent of the area defined, and appropriately reflected in the planning scheme, by the end of 2019'. • Although Redland City Council was able to consider the STPFGA's suitability for other uses such as urban residential purposes, for the reasons outlined in previous sections of this report, Council believes it has a sufficient quantum of suitably zoned land to accommodate future population growth to 2041. • While *ShapingSEQ* states that Potential Future Growth Areas 'are not required to accommodate the dwelling supply benchmarks or employment planning baselines of *ShapingSEQ*', further commentary in Chapter 3, Part C: Sub-regional directions (p.114) makes it clear that Council is required to investigate this area, determine its appropriate use and make changes to its planning scheme in the short term. This position was reiterated in the Ministerial Direction provided to Council on 23 July 2020. • Officers are of the opinion that its actions to date have satisfied the general requirements of the Ministerial Direction and further	No changes required.

Submitter #(s)	Submission and grounds	Analysis/ Officer comments	Changes in response to submission(s) / recommendations
	• Reference is drawn to the SEQRP which indicates that there is no great rush to accommodate urban growth in STPFGA's and their intent is to protect their future. • Why is there so much pressure being put on the Redlands when evidence suggests that there is adequate existing land supply.	consultation with the State Government will occur if Council decides to proceed with a major amendment to City Plan.	
8	Redlands 2030 Community Plan: • The proposal doesn't align with the vision statement included in the Redlands 2030 Community Plan *'the Redlands will be known for the pristine waters and island of Moreton bay, and for its protected bushland areas, greenspaces and parklands. Flora and fauna will be abundant and koalas will live peacefully in urban and rural settings'*. • It is difficult to have faith that the iteration of the STPFGA will become the first cut of many, losing the values of Southern Thornlands in a slow evolving development tsunami.	• Prior to identifying preferred future land use intents for the STPFGA, Council officers prepared a planning report to examine values and constraints across the study area. The analysis included a consideration of wildlife corridors (as per Council's Wildlife Connections Plan 2018 – 2028) and environmental values such as Matters of State Environmental Significance (MSES), which includes core koala habitat areas. The planning report identified these areas as category 1 constraints, which for the purpose of the planning assessment, meant the areas were not considered suitable for more intense forms of urban development. • Although the entire STPFGA has been assigned a precinct, this does not mean that each precinct will be 'fully developed'. Rather, parts of the sites will be undevelopable because they contain a constraint or value that needs to be addressed/ protected. For example, the MIBA Precinct is 100 hectares in size but if developed, is intended to provide 50 hectares of allotments. This means that up to 50% of the MIBA is likely to accommodate	No changes required.

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		features including, but not limited to infrastructure, habitat areas, environmental corridors and flood impacted areas. In addition, any future development proposed in these areas would need to comply with the relevant provisions in the planning scheme, including the Environmental Significance Overlay. Council is not intending to facilitate development.	
1, 2, 5, 6, 7	• The regional infrastructure corridor bisecting the study area could open up this area for responsible (higher order) development. • The area is capable of being connected to the Cleveland sewerage treatment plant for urban uses / master planned community providing housing, economic growth and building and construction opportunities. • The newly approved subdivisions at 84-122 Taylor Road and 157-197 Woodlands Drive did consider the feasibility of connecting to Council's reticulation infrastructure, contrary to the contents of the STPFGA planning report. Refer to P&E Court appeal 2675 of 2009 (document 45).	• As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. • To date, the annual land supply and development monitoring reports released in 2018 and 2019 have identified that Redland City has sufficient supply of suitably zoned land to meet the consolidation and expansion dwelling supply benchmarks of the Regional Plan. Preliminary data for 2020, supplied by the Queensland Government to Council, indicates that this position remains unchanged. • Officers acknowledge that the statement regarding the feasibility of connecting to reticulated infrastructure networks is incorrect. As noted by the submitter, this information has been made available in Planning and Environmental Court appeal documents (Item 45, case 2675 of 2009).	The STPFGA planning report will be updated to reflect the information provided in the submission.

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8	The officers correctly acknowledge the impact of COVID-19 on population growth as an economic driver due to the absence of inward migration. Over time, planning assumptions will have to be revised.	Noted as a general comment. Officers expect that COVID-19 impacts will be accounted for in future iterations of population forecasting produced by the Queensland Government Statisticians Office (QGSO). This data is used to inform the preparation of planning documents such as the South East Queensland Regional Plan and City Plan.	No changes required.
1, 2, 4, 9	COVID-19 should not be a basis for planning decisions as a vaccine will be available soon.	Noted as a general comment.	No changes required.
10	Appreciate the opportunity to comment on the planning of the SFPFGA.	Noted as a general comment.	No changes required.
1, 2, 3, 4, 5, 9, 10	• Council has failed to complete the consultation required by the Ministerial directive as land owners were not written to with a project plan / inviting comments and were not invited to a landowner forum. • The STPFGA website is confusing and does not contain independent consultant reports (past and present). • There is no reason to have closed Council meetings. • It's a huge ask for the community to comment about such a proposal as few people have the time and expertise to be able to read all the documents.	• On 23 July 2020, the Minister for Infrastructure and Planning wrote to Council advising that a Ministerial Direction had been issued under section 26 of the *Planning Act 2016*. In the letter, Council was instructed to write to landowners within the STPFGA and hold a forum between 31 July 2020 and 11 August 2020. • In subsequent correspondence provided by Council to the Planning Minister on 29 July 2020, Council advised that as the STPFGA was of strategic importance to the City, undertaking a city-wide consultation process would be preferable. On 16 September 2020, Council formalised this position by resolving to publicly consult on the preferred future land use intents for the STPFGA, commencing 28 September 2020. The consultation period, which ran until 20 November (39 business days), provided all community members with the opportunity to make a submission on the preferred future land use intents for the STPFGA.	No changes required.

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		• Council will make the CDM Smith Economic Feasibility Assessment and Industrial Land Supply Review publicly available as a background attachment to the Council Report and on the STPFGA Your Say web page. • Officers acknowledge the comments made in relation to the volume of information made available on the website, but note that a further statutory phase of public consultation will occur if Council decides to proceed with a major amendment to City Plan, following the State Interest Review period. This will provide the community with further opportunities to review and provide feedback on the proposed amendments.	
1, 2, 3, 4, 5, 7, 8, 9	• The report ignores the recent approval of 156 Woodlands Drive as a crematorium. • Land owners have no intention to abandon existing commercial enterprises. • To consider how fragmented land can be combined is not for Council to determine. • Private freehold land is being identified for public outcomes (including schools). • Quarantining of private land for public purposes prevents strategic and economic opportunities.	• Officers made note of existing industries and employment generators within the STPFGA in section 8 of the planning report. Although there is an active approval for a cemetery on 156 Woodlands Drive, officers understand that this approval has not been acted upon. Regardless of this fact, the approval is not likely to have had a decisive impact on proposed land use map Council released for public consultation. • It should also be acknowledged that Council's preferred future land use intents in no way place any obligation on any landowner within the STPFGA to sell their land or pursue an alternative use on their land. This would remain a decision for landowners to make. Furthermore, existing lawful land uses in the STPFGA continue to remain lawful in perpetuity. • The fragmentation of land was considered by CDM Smith when it prepared the Economic Feasibility Assessment. This was an	No changes required.

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	• Do not agree that the recent development approvals (Wigans/George) makes these area less suitable for urbanisation.
	  ○ The minimum lot sizes were driven by Council even though expert witnesses state that the CSTP could service smaller lot sizes.
	  ○ The minimum lot sizes of 6000m2 is merely a condition the underlying material change of use is Res A (low to medium density).
	  ○ Council has not consulted with them, as an appellant, to ascertain their intentions towards the development approvals.
	• Council has undertaken the study as if it were public land with no regard to the private freehold land status of the study area.
		important consideration when determining whether it would be economically viable to deliver a MIBA within the STPFGA.
		• The analysis undertaken as part of the planning report was used as a key input for CDM Smith's Economic Feasibility Assessment, particularly with regard to identifying the preferred location of the Mixed Industry Business Area (MIBA) Precinct. In the planning report, officers noted that the ROL approvals over 157-195 and 197 Woodlands Drive (ROL6097), as well as 84-122 Taylor Road (ROL6209) would exacerbate land fragmentation issues in this locality. Recent aerial imagery indicates earthworks associated with ROL6097 are currently underway, validating the approach taken by officers to exclude these areas from consideration. Officers do however, acknowledge that the applicants may choose not to act on the development approvals.
		• The other remaining comments are noted as opinions or general observations.	

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	• There are opportunities for the three largest landowners to work with other land owners to achieve mutual interests. • The proposed precincts, apart from rural residential, attempts to reflect the nature of already existing uses.		
1, 2, 4, 7	• Council has refused to carry out a proper planning assessment of this area despite being reminded by the Minister on numerous occasions. • The investigation does not integrate state interests for urban use in the short term into the planning scheme as intended by the ministerial directive. • The Council has never had an intention to investigate the suitability of the STPFGA for future urban outcomes despite receipt of ministerial direction. • The state government should 'step in' and take over the planning for this area.	• As outlined in previous sections of this report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. For this reason, Council did not consider the suitability of the STPFGA to accommodate urban scale residential development. • As outlined in section 9.3 'Commentary on the need for additional residential zoned land within Redland City to 2041' of the STPFGA planning report, Council believes that there is sufficient land within the Urban Footprint to accommodate population growth in the City to 2041. This position has been reaffirmed by the Queensland Government through its annual Growth Monitoring Program. For this reason, Council did not consider the suitability of the STPFGA to accommodate 'suburban scale' residential development.	No changes required.
4, 5, 7, 9, 10	• The investigation is essentially a desktop investigation which cuts and pastes from previous reports to	• The planning report was based on a desktop assessment of planning constraint and analysis, due to time and resource limitations. Officers note that obtaining access to ground truth	No changes required.

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	achieve a predetermined outcome and has not been ground truthed. • Do not support constraints map/ the constraints have not been ground truthed. • The investigation does not rely on technical analysis or include independent consultant reports. • There is no clear line of sight for any realistic short term development. • The proposal does not provide certainty of delivery or economic feasibility. • Do not support the methodology or policy bases used by Council to determine the best use of the study area.	information would have been a significant and time consuming task, due to the number of land holdings and the fact that the majority of allotments are privately owned. • Council's preferred future land use intents have been informed by both the planning report and independent investigations conducted by economic consultancy firm CDM Smith, including the Economic Feasibility Assessment and Industrial Land Supply Review.	
7, 10	• Support the spatial extent of the STPFGA as it aligns with previous investigations. • In the SEQRP, the STPFGA does not cover this massive area. • The road networks, particularly Boundary Road, Taylor Road, Redland Bay Road and Duncan Road, are congested with traffic, causing	• The STPFGA is not cadastrally defined in the South East Queensland Regional Plan (ShapingSEQ). In order to provide scope for the requisite planning investigations, on 9 October 2019, Council resolved to endorse the spatial extent of the Southern Thornlands Potential Future Growth Area (STPFGA). • Traffic impacts are noted as a general concern. • The constraints map produced as part of the planning report shows large parts of the study area are generally unsuitable for more intense forms of development. However, there are also	No changes required.

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	pollution – no more activities which cause more congestion / pollution. • The constraints map shows the area is unsuited to closed development.	large tracts of land within the study area that could be suitable for further development, following more detailed planning investigations (e.g. structure planning).	
4	• The Redlands Coast Rural Enterprise Investigation Report inaccurately concludes 'investigation study completed and appropriately reflected in the City Plan, SEQ Regional Plan requirement delivered'	To clarify, these items are 'performance measures' that will be used to determine if the relevant objective in the Rural Enterprise Industry Sector Plan 2019-2024 has been completed.	No changes required.