

19 May 2017

[details removed by request]

Re: BCC Development Application #A004353123

1. I note that Brookfield Residential Properties (BRP) are applying for preliminary approval to, a) make a material change of use, b) reconfigure a lot, and c) to carry out building work.

2. I wish to comment on applications a) and b) only.

3. I note that the proposal from BRP involves (i) a recreational open-space component and (ii) an open-space bushland component. BRP wish to transfer ownership of the land associated with these components into the public domain. Whilst I support the development of (ii), it is (i) I wish to comment on.

4. I note that the assessment team wrote to BRP on 12th Sept 2016 advising that -

"Furthermore, the proposed sport and recreation precinct is proposed to be dedicated to Council. This is not supported. If the sport and recreation is accepted, it is to remain in private ownership."

5. I can understand the assessment team's position if BRP were seeking an offset to such Infrastructure Levy as BRP might incur during the proposed development. This is reasonable given that open-space/park is not a requirement of either the Priority Infrastructure Plan (PIP) or the Enoggera Neighbourhood Plan. However, my understanding is that BRP wish to transfer the recreational component to the public estate without charge, offset or encumbrance.

6. I hereby wish to bring it to the team's attention that the development proposed by BRP stands to unlock a unique recreational resource of substantial value, not to the neighbourhood so much as the region, and furthermore, such an action would be in line with the Brisbane City Plan 2014 (BCP14).

7. The proposal to develop the recreational component for rock climbing exactly aligns with the strategic aim 3.4.1 (r) of BCP14 - "Brisbane's parks network is accessible and designed to meet the needs of changing demographics and changing trends in recreation activities." Recreational rock climbing is one of the fastest growing sports world wide, and is set for even more rapid growth, with sport climbing now an official Olympic sport.

8. Specific outcome, SO3, of BCP14, states "Brisbane's parks and open spaces provide a diversity of experiences." Partnered with the Land Strategy, L3.1, "Parks are planned and managed to provide a diversity of experiences including informal recreation, formal sports, community gatherings, active travel, landscape amenity and nature-based recreation." Although Keperra might not be included in the extents of the PIP, I believe that the consideration of "diversity of experiences" called for in BCP14 enables a wider view of the potential land use.

9. From a planning perspective it is important to acknowledge that climbing locations are inevitably tied to just those few areas that present suitable cliff lines. Whilst swimming pools and skate parks can be installed with reference to the dictates of the PIP, the same is not so of recreational rock climbing. The sites that do present are few and far between, and accordingly, attain disproportionately high value as recreational real estate.

10. Keperra Quarry is a granite quarry, and granite rock faces are most highly valued for climbing. Such is the value attached to granite, that local climbers frequently make the 400km round-trip to climb at Paschendale and Girraween. Thus the potential value of granite climbing within urban Brisbane should not be underestimated.

11. The recreational value of the Kangaroo Point cliffs to the climbing community is of the order of \$1M to \$1.5M p.a. Given the extensive cliff line to be exposed as part of the BRP project, I would anticipate that the value of Keperra Quarry could reach this value over a period of five years. Such a unique and valuable asset may best reside in the public domain.

12. In summary, I support application a) of the proposal, ie the material change of use, provided that change involves the recreational component (i) being publicly accessible.

13. With regard to the application b) of the proposal, ie the reconfiguring of a lot, it is not clear at this stage exactly what is being proposed. As already stated at 5. above, it seems likely that, since an Infrastructure Levy offset is not being sought by BRP in this regard, the possibility of the recreational component being transferred to Council as fee simple in trust (as envisaged by the Sustainable Planning Act 2009, s933(c)) is moot.

14 If it is sought to transfer the ownership of the recreational component into the public domain, the only tenure that secures the public interest in the long term is a State Reserve under the Land Act. It is a secondary issue as to which body will be appointed Trustee under the Act. Common sense says it should be Brisbane City Council because there already is the successful example of Kangaroo Point Parklands which follows this model. However, as far as the planning decision goes, I believe the trustee is of secondary importance. What matters is that the valuable recreational asset of Keperra be secured at State level. The nearest granite climbing to Brisbane is at Stanthorpe, 200km away. This is a State level recreational issue, and State Reserve is the only appropriate tenure.

15. In summary, I support application b) provided the recreational component (i) is tenured as a State Reserve under the Land Act.