

Ian Fairweather

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The Project Manager, North Bank,  
PO Box 15009  
City East Brisbane Qld. 4002

Dear Sir,

### **Detail Comments on North Bank “Enquiry By Design”**

I have already briefly recorded, by email, my opposition to any development of North Bank that includes the construction of high rise buildings on a platform in the river. I am not opposed to doing something with the land part of the site. These notes are intended to set out in more detail the reasons for my position. Certainly the Enquiry by Design schemes have much less impact on river flooding than the original, but flooding is not the only reason why there should not be buildings in the river. The only structures in the river should be those relative to the use of the river such as ferry terminals, boat moorings, bridges, and perhaps a walkway.

The Government by its action, seems to think that the River is underused land waiting for development. It is not as it performs probably the most important and inevitable function of any area in Brisbane and that is to transport the flood waters of the Brisbane River. For this was it formed, and in spite of Governments and developers, this is what it will continue to do, long after any development that might result from North Bank has crumbled into ruin. **So leave the River alone.**

The requirements set by the Government for the development results in an expenditure on Core Infrastructure of the order of 86 million Dollars. Has anyone ever question the need for this level of expenditure? Can such expenditure be justified? The Government has got to realise the North Bank is not South Bank, they are entirely different, North Bank is narrow and steep, South Bank is wider and relatively level, with vehicles excluded. South bank is aimed at tourist unrelated to the river. North Bank is an important heritage area in the history of Brisbane, so the areas need to be treated differently. Despite what appears in the documents, the Government is in reality trying to create another South Bank in an area that is not suited to such development.

Following ongoing public concerns about the shape and nature of the development proposed by the preferred developer, the Queensland Government set up an “Enquiry By Design”, the purpose of which was to discuss these concerns and to investigate design and planning options for North Bank. It is well documented that, in recent months, the public concerns were mostly about various aspects of the proposal to build high-rise commercial buildings on a platform in the River. It is reasonable to assume that a proposal without buildings in the river would not have attracted the same adverse attention

There is a very serious flaw in the Project Objectives and Requirements by which the “Enquiry By Design had to operate, and that is the requirement that “The Project be delivered at no cost to the Government.” Because of the make up of the site the only

area where any major commercial development can take place is on the water part of the Site. This means that the Enquiry was unable to address the source of the main public concerns, namely buildings in the River. **It would be an error of judgment to assume that the EBD report is an endorsement of buildings in the river. It is not!** The following statement appears in the report of the EBD; “Some (this was changed from **many** in the presentation on 23/06/08) participants expressed continuing concern about the prospect of development occurring in the river, and were apprehensive that the requirement to fund the delivery of the core public infrastructure from the proceeds of development on the North Bank Site would compromise an optimum urban outcome.” This statement needs to be taken very seriously, it would not be very wise to have so much money spent for second or third best. I think it is fair to say that the “Enquiry By Design” was unable to properly address the reason for which it was set up in the first place.

In its justification for continuing with this proposal the Government makes two statements, which follow together with my comments.

1. “That 80% of public feedback supports the need for North Bank to be transformed”, but if it had been explained clearly to the people, at that time, that to achieve this transformation, in the way the Government wants it financed, there would have to be extensive high rise development on a platform built into the River, the feed back at that time would most likely have been different. This is demonstrated by the need the Government saw to set up the “Enquiry By Design”. In View of this the Government in all honesty cannot continue to use this historical figure of 80% as the justification for the project.
2. “Stage 1 development of North Bank will revitalise the riverfront and will reconnect the CBD and the people of Brisbane with the river”. Considering the total extent of existing public access to the river, it takes a fair stretch of ones imagination to see how a 600 meter long development is going to reconnect the people of Brisbane with the river. They are not really disconnected now. The CBD is well connected to the River with the Gardens and in the Eagle Street area. The reconnection of the people to the River started about the middle of last century when the Brisbane City Council commenced resuming riverside properties. I think also that before stage I is committed, the people should know how it will fit into further stages of development.

I would now like to comment on the Design Guide lines. I will use the numbering used in the summary.

A: It is hard to see how North Bank can be made the “Front Door” for the City Centre. I would think that by definition the “Front Door” would be where the majority of people enter. Most people including visitors come to the city centre, by bus, train, taxi, private car or by foot. A few see the city centre for the first time by arriving on a ferry or city cat. It does not matter how much money is spent on North bank, this situation will remain substantially unchanged. North Bank can be another door, but never the front door. Perhaps it would make more sense to turn South Bank into the Hub for River based tourism. It is interesting that despite all the rhetoric about South Bank, very little that exists there is related to the river, if this is the Government's aim, it might be a good idea to change this.

B3 & B4: Having regard to the Brisbane Town Plan and other sensible considerations the only acceptable flooding impact is none at all.

C1: The only change to the site should be to remove the river portion and extend the site into other land owned by the Government that is not in the Brisbane River Corridor.

H: Then there is the matter of traffic. I don't believe that there is much in the way of justification for developing the North Bank area in a way that is going to attract many extra cars to the area, to do this would seem to be contrary to the concept of making the North bank safe and people friendly. In any case I don't think the EBD proposals have developed a satisfactory solution to the many traffic problems that will occur in the area if commercial development proceeds in the river. It just seems that in trying to solve one set of problems other unnecessary ones are created.

#### NORTH BANK OBJECTIVES.

What does the statement “Complement South Bank by creating a convenient leisure loop connecting the waterfronts of both sides of the river” mean.? Does it mean another bridge? If this means a convenient and safe walking and bike way it can be provided for a lot less than 86 million dollars and without the need for buildings in the River. The statement has a nice ring to it, but I don't think it means much.

#### GENERAL COMMENTS

Then there is the open space aspect of the River. It may not appear on zoning maps as open space, but that what it is and should be treated from this point of view with the same respect that is shown to other open space. For example, I don't believe that any government would even consider seriously trading off part of the Botanical Gardens to a developer, to build high-rise buildings in exchange for some public infrastructure.

I have great difficulty in trying to understand, having regard to the flood history of Brisbane, the Climate Change reports and all that follows from them, how any responsible person could contemplate high rise buildings in the river, I can understand that people who do not have a detailed understanding of the River could suggest such a thing, but I cannot understand how, with all the expertise and experience in the Government and public service ranks, it was ever put into the public arena and why with all the well founded objections it was not abandoned a long time ago.

We have been assured that once a plan of development is prepared by Multiplex and accepted by the Government it will be subjected to the same scrutiny that all private developments, without Government involvement. So I suppose that if, after that process, the green light is given to the buildings in the River, one can no longer object. However if the approval process and the criteria are such that high rise buildings are allowed in the river, it would be legitimate to question that process. If the proposal does get planning approval, I hope there is some one, who has the well-fare of the city at heart, and has the necessary authority will set about changing the process so it cannot happen again.

The dangerous precedent set by allowing the proposed buildings in the river must not be overlooked. Multiplex have already tried to use Waterfront Place as a precedent.

Certainly the EBD schemes reduce the flood impact of the development; but there should be none. I think the Brisbane Town Plan recognises this. Apart from flooding there are many other valid reasons why there should not be buildings in the river. I believe the Government should show some maturity and leadership in the matter of protecting the river by abandoning the idea of buildings over the water. To continue with the current proposal, seems to me to be to be acting completely contrary to the way a responsible Government should act.

I believe, with an expenditure of much less than 86 million dollars, North Bank can be made an attractive people place without commercial development in the river. I am sure if the talent of the EBD group had been allowed to develop a plan for North bank without large commercial development on the site, a plan acceptable to all would have been the result, and we might have seen the work proceed without all the public concern that will surely follow if the Government continues with the madness of using the Brisbane River as a bit of saleable real estate. This act of legal vandalism must be stopped.

Yours faithfully

Ian Fairweather