

RE: Australia's preparedness to host Commonwealth, Olympic and Paralympic Games

Please find below additional comments and clarifications from the Victoria Park/Barrambin Residents Action Group (VPBRAG) with regard to the above stated hearing (the Hearing).

ISSUES

Issue 1 – Support for Victoria Park stadium without due analysis

- We continue to question how a Victoria Park stadium can be proposed and instantly championed by so many when it was not supported by any detailed studies e.g., traffic and transport, ecological, noise impact etc.
- It is unclear why the Report did not outline specifically how it was meeting the IOC new norms.

Issue 2 – Inconsistent information in the Report and the Hearing.

During the Hearing Graham Quirk references information relating to the Victoria Park stadium which was inconsistent with what was stated in the Sports Venue Report (the Report). The introduction of new/inconsistent information at the time of the Hearing raises concerns regarding information transparency and/or accuracy. The following outlines two examples:

Stadium Location

The Report states - *"The exact location of a stadium within Victoria Park should be subject to further analysis, including exploring existing built upon and previously disturbed areas"* (page 10).

Graham Quirk at the Hearing: - "There were a number of factors that drew us to the conclusion that Victoria Park was the best option available. They were these. Firstly, there is a disturbed area in Victoria Park which is existing car park space and low-scale structures—some temporary, some permanent, but none more than two stories in height. It was our view that that would be the best place to locate the stadium".

VPBRAG - It is deduced from additional commentary at the Hearing that the Olympic Stadium would be built over the Victoria Park function centre and car park off Herston Road. By failing to include this important information in the Report it was not possible to fully analyse the impacts in advance of the Hearing e.g.,

- the compounded logistical challenges that this site would pose due extremely close proximity to Australia's largest hospital and associated health precinct
- the area directly beneath this site flooded in 2022 and the Report provided no analysis provided on the additional impacts of a major concrete structure at the top of a hill above an area which incurs flooding.
- the topological challenges and massive earthworks required from placing a stadium on top of this sloping site.

During the Hearing, Graham Quirk uses the wording 'disturbed' inferring that using already disturbed land would significantly reduce the negative impacts of the Stadium. It is considered that this use of language is misleading as disturbing land for a 55k capacity stadium would have significantly greater impact than land disturbed for a carpark of two-story building.

The Report, nor information provided at the Hearing, failed to provide any clarity re impacts of the warm-up track.

Netting off Green space

The Report (re The Gabba) 'It is recommended that, when an alternative stadium becomes available, the existing structure be demolished and the site be repurposed'.

Graham Quirk at the Hearing: Brisbane City Council has a policy of no net loss of green space in the city. Our proposal, as inferred in the report, was that you could potentially turn the Gabba, an area which is in drastic need of additional green space, into green space over there. There would be a loss in one location but a gain in another area which was drastically in need of open space, where there is much-higher-density housing and the like.

VPBRAG - There is no reference in the Report to greening the Gabba. There is no costing or business case. The language appears convenient without proper analysis or commitment.

Brisbane City Council has spent a considerable amount of ratepayer's money on consultants who have undertaken assessment for the Victoria Park Master Plan Local Government Infrastructure Designation ([LGID | Victoria Park Lgid](#)). There is no evidence that in proposing the Victoria Park stadium proposal that they drew on analysis when formulating their major recommendation. Among a suite of 21 documents there is an Ecological Assessment Report. This report highlighted information relating to existence of mature trees across the site, significant species, wildlife corridors etc across Victoria Park. te

It appears inconsistent that for a master plan relating to a park that recommendations would need to be substantiated with analysis however a sixty-day assessment resulted in a recommendation with inevitable widespread environmental ramifications without any analysis.

Issue 3 – Failure to provide required analysis

Peter Edwards of Archipelago Architects, at the Hearing:

- speaks about costs of his proposals however it is unclear where to source the business case to substantiate the financial costings he raises.
- makes broad references to 'no not less of open space' however no definition of 'open space' is provided or substantiated. It is noted that questions relating to green spaces were often met with responses referencing 'open space'. In some jurisdictions open space can include carparks or roads. Using the terminology 'open space' can just act to diminish the significance of the environmental impact.

The diagrams provided in the media as relate to Brisbane Bold appear to be within two dimensions and there is lack of clarity as to how they accommodate the challenging topography of the site.

Peter Edwards at the Hearing notes 'would not be able to say *categorically that there wouldn't be impacts on the neighbouring areas*' highlighting the lack of assessment behind the Brisbane Bold vision. The neighbouring area includes the biggest hospital in Australia.

CLARIFICATIONS

Clarification 1 – Netting out green space

With regard to the following comment please note the additional points raised:

Senator ALLMAN-PAYNE: But what I would like to ask you is this. It's very clear that, even if there was no net loss of green space, it would certainly be lots of disjointed, smaller sections of green space. Could you speak to the value of having a large area of protected green space versus equivalent amounts of small bits of green space all connected? I might ask you first, Ms O'Hagan, if you have a response to that, and then I might go to Ms Handley.

Ms O'Hagan: It comes down to this. I'm not a botanist, but I look at it and think that the important thing here is that you've got a mature green space. The golf course was there for a long period of time, and you've got some mature trees. You've also got, basically, wildlife that's been protected because you've only had golfers go through it. If disrupting the mature space and creating lots of different spaces and buildings in between, you can't necessarily protect the environment in the same way. When they were doing the Victoria Park master plan, they were also looking at wildlife corridors. You look at all the different aspects of this. Really, there have been no environmental assessments done on this bold plan. I think it's bold, because I think it's environmentally very bold. I don't think I can comment too much on it, because no assessment has been done on it to substantiate its impact.

VPBRAG additional comments: Simply netting out green space across a city by replacing established mature green space with multiple small lots of new green space will not provide the same environmental benefits given:

- smaller, newly established green spaces will not support the same extent of diverse habitats and ecosystems needed, in turn, to support a wider diversity of plant and animal species
- larger green spaces, especially those with mature green trees, serve as wildlife corridors connecting fragmented habitats and allowing species to migrate, find food and breed. (reference [Why Urban Parks & Wildlife Corridors Are a Legitimate Solution – Terrascope 2024 \(mit.edu\)](#))
- larger areas can absorb and store more carbon dioxide, helping to combat climate change more effectively.

Clarification 2 – Traffic and Parking

With regard to the following comment please note the additional points raised:

Ms O'Hagan: *I live close by, and I know that most people who visit me would drive. I also know that, for example, you'll find most people drive to the Green Heart Fair, ironically. So Herston isn't the easiest place to get to, and, even with the Brisbane Metro and the Cross River Rail, I don't think it will be alleviated that substantially.*

VPBRAG additional comments: The comment, as to whether traffic and parking congestion will be substantially alleviated, was difficult to answer within the context of the hearing based on Olympic venue locations. The proposal to put a stadium at Victoria Park was not backed up with any transport studies. To assess the impact and make meaningful commentary requires analysis of information not provided. The above statement is based on informal observations of current conditions and current site use only.