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10 December 2019

Coomera Connector project team
Transport and Main Roads
36 Cotton St
NERANG QLD 4211

Dear Sir/Madam

COOMERA CONNECTOR COMMUNITY CONSULTATION, STAGE 2: LOGANHOLME TO COOMERA

Thank you for the opportunity to provide feedback on Stage 2 of the Coomera Connector, Loganholme to Coomera, as part of the community consultation process.

Background

Council welcomes the Queensland Government's decision to investigate route options for the Coomera Connector. We acknowledge that Stage 1 has been given priority for construction but welcome the opportunity to provide early feedback on the Stage 2 of the project (Loganholme to Coomera), which passes through the City of Logan.

Council recognises the need for an alternative transport corridor that will ease M1 constraints, balanced with considered planning that ensures:

- Impacts to the environment are minimised and mitigated
- Impacts to residents is minimised and mitigated and
- Economic impacts are considered

The following submission addresses these considerations.

Economic Impacts

Significant resources have been invested by Council in recent years to develop Logan's tourism sector, the cornerstone of which was the Loganholme Tourism Precinct. This collection of neighbouring properties has been progressively acquired by Council over the past 15 years and is ideally situated between the principal activity centres of Springwood and Beenleigh, with close and easy accessibility from the major centres of Brisbane and the Gold Coast.

In August 2015, Transport and Main Roads identified three parcels of land adjoining the Loganholme Tourism Precinct as surplus to its needs. Council negotiated in good faith to acquire the surplus parcels, with a view to incorporating them into Loganholme Tourism Precinct vision.

The proposed alignment of the Coomera Connector will have significant impacts on the ability of Council to effectively develop not only these three parcels but the proposed precinct itself. The Coomera Connector route splits the precinct's land, making large portions of it inaccessible and drastically impacting upon its value to Council and more importantly, the community at large. Council considers the full tourism potential and economic vision for the site fundamentally compromised as in effect, both the newly acquired sites and the remainder of the precinct will be landlocked.

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In addition, Council has been negotiating with investors of an integrated bio-tech manufacturing company to facilitate an edu-tourism facility upon the Land. As the Land is detrimentally affected by the Coomera Connector, it is no longer suitable to effect a desirable outcome and Council has turned to the active identification of alternative sites.

Given the above issues, Council wrote to the Minister for Transport and Main Roads earlier this year and is looking forward to a response in regards to:

- Early acquisition of the Loganholme Tourism Precinct by the department; and/or
- Discussions surrounding viable land swap alternatives to facilitate the investment of the bio-tech company

Environmental impacts

The proposed Coomera Connector route runs through multiple areas of high ecological value in the Logan suburb of Eagleby. While Council acknowledges the transport need for an alternative M1 route, the potential environmental impacts of the proposed Coomera Connector should be carefully considered in the context of these environmental values and mitigated where possible. Measures to protect the amenity of Eagleby residents living close to the proposed route should also be considered.

Open areas and parklands in Eagleby area provide informal and formal conservation of vegetation and fauna habitats, places for community recreation, as well as green breaks for residential communities. Areas within and adjacent to the proposed corridor also contains a series of open spaces, reserves and parklands that contain significant vegetation and provide habitats for a number of animal species. There is evidence of past use of the area by the local traditional owners, the Yugambeh.

The current proposed route runs directly through wetlands, waterways and biodiversity corridors in Eagleby. These area include endangered, of concern and not of concern remnant and regrowth vegetation, acid sulfate soils as well as essential habitat. This chain of wetlands are identified as Matters of State Environmental Significance, including:

- High ecological significance wetlands
- Regulated vegetation areas
- Wildlife habitat area
- High ecological value waters (Logan and Albert Rivers)

These areas are also important local wetlands protecting water quality, providing flood storage and recharge of ground water. It is suggested that further consideration of the specific corridor alignment is required to avoid and minimise the impact on the environmental values in the area.

Other specific areas of feedback related to the extent of the Coomera Connector from an environment perspective have been included in attachment 1.

In addition to these issues, the Eagleby Community and Wetlands Group have also written to Council in regards to their concerns over environmental and health impacts. Some of the issues raised by the group have already been reflected above, while others include:

- Concerns about building on a flood plain and potential flood impacts to properties
- Possible impacts on endangered and vulnerable bird species
- Health considerations for residents who will be located between two major highways (the M1 to the west and the Coomera Connector to the north and east)

- Concerns around the spread of Fire Ants due to the movement of heavy vehicles and soil movement. Eagleby is listed by the Queensland Government as being in fire ant biosecurity zone 2

These issues raised by the community should be given proper consideration by Transport and Main Roads when finalising planning for the Coomera Connector's northern alignment.

Transport network impacts

Council considers that the proposed Coomera Connector will assist in easing current and predicted M1 congestion issues as an alternate route. The connection to Mt Cotton Road appears to be a potential solution to link help disperse traffic at the northern end of the project.

As per previous advice to Transport and Main Roads officers, an alternative approach for the connection to Fryar Road is appropriate. Access to and from the Coomera Connector and the Mount Cotton Road extension to Fryar Road should be restricted to mitigate against:

- Significant traffic flow increase in Fryar Road as a result of opening up the road, which is currently a cul-de-sac.
- The function of Fryar Road being elevated to Arterial Road level, triggering necessary upgrades (possibly four lanes), which will impact properties on the road corridor and create major traffic flow changes
- Impacts to property owners on the other side of the Logan River in Carbrook depending on the chosen alignment of the route.

There may also be an opportunity to incorporate improved bus connections as part of the Coomera Connector, in conjunction with Transport and Main Road's Gold Coast North Area Transport Strategy (GCNATS) study. As the current M1 upgrade program will extend the South East Busway to Springwood and possibly Loganholme, GCNATS and Coomera Connector project should consider allowing Bus Priority from the Hyperdome to Nerang.


In summary

Council supports an alternative transport corridor to ease pressure on the M1. The current Coomera Connector alignment may result in environmental impacts that need to be properly considered and avoided and/or mitigated where possible.

Should the alignment and connection to the M1 and the Logan Motorway not change, Council is also keen to progress discussions around the early acquisition of Council's Loganholme Tourism Precinct by TMR as a matter of priority.

Thank you again for the opportunity to make this submission.

Yours Sincerely,


Tamara O'Shea
Interim Administrator, City of Logan

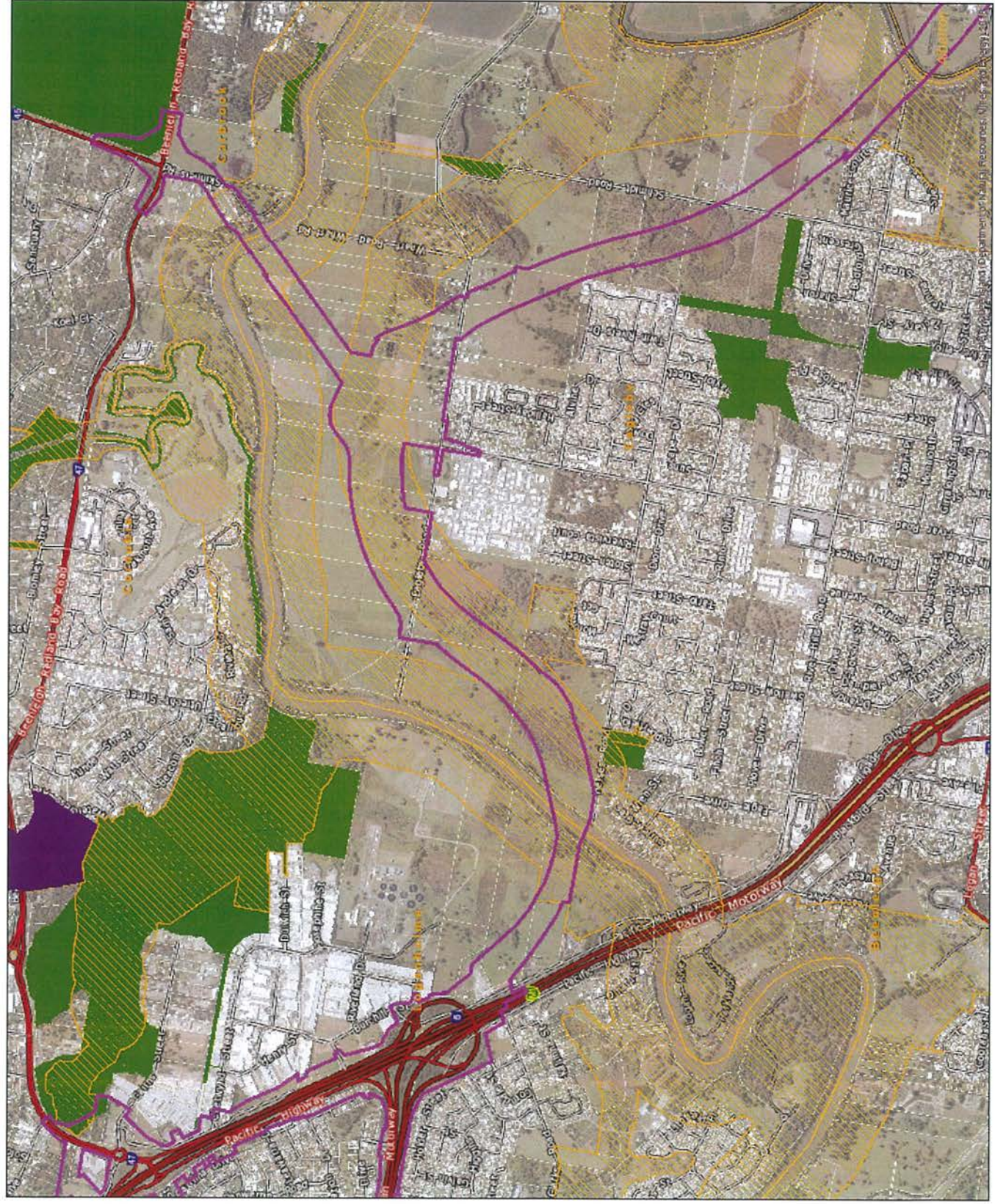
Attachment 1 – Detailed environment feedback

Theme	Feedback
Accessibility and amenity	<ul style="list-style-type: none"> • Council has undertaken extensive planning and developed the Logan and Albert Rivers Accessibility and Connectivity Plans. To ensure community access is maintained, it is suggested TMR could consider these plans and where possible, protect and maintain access. • Design and construction concepts could also take into account Council's Logan and Albert Catchment Action plan and incorporate Design for Crime Prevention Through Environmental Design (CPTED) elements.
Biodiversity Corridors Habitat of Ecological significance	<ul style="list-style-type: none"> • Council has identified floodplain biodiversity corridors linking the wetlands, waterways and existing vegetation and other environmental values (refer to attached Maps 1, 2 and 3). The proposal impacts a significant portion of these corridors and is likely to impact the movement of wildlife. Council suggests realigning the route or giving consideration to maintaining or enhancing habitat values and wildlife movement opportunities as per the Logan Planning Scheme. • Habitat loss and fragmentation are the two main contributors to biodiversity decline. It is suggested the design avoids and minimises habitat fragmentation. • The design could also consider the aims of the Logan and Albert River Visions and the Logan River Accessibility plans. • The wetland systems identified within the proposed corridor are identified as critical habitat for acid frog species (refer to Map 4). These species rely on an acidic ecosystem for reproduction and survival and habitat loss is the number one threat. Council suggests realigning the route or giving design consideration to avoiding impacts on these wetlands. • The proposed alignment of the Coomera Connector traverses Schmidt Road, Eagleby, at a site where the threatened plant species <i>Persicaria elatior</i> (Tall Knotweed) occurs. The proposed road design considers and protects the habitat requirements of this plant. • Aim to increase vegetation cover and habitat quality
Waterways and Wetland,	<ul style="list-style-type: none"> • The current alignment of the proposed roadway impacts on five High Ecological Value Wetlands (refer to attached Map 5). In addition, it follows the existing waterway and wetland complex around the whole of Eagleby (refer to attached Map 6 and 7). Council suggests realigning the route or giving design consideration to avoiding impacts on these wetlands. • To protect ground water dependent ecosystems such as the existing wetlands, Council suggests design and construction methods are used that limit adverse changes to the local hydrology • Consider bridge design across the Logan and Albert Rivers to ensure fish passage and habitat

	<ul style="list-style-type: none"> At risk is the riparian vegetation function along the main channel of the Logan and Albert Rivers and the waterway and wetland complex surrounding Eagleby. Enhancement of vegetation and riparian vegetation, adjacent to Logan and Albert river crossings as well as the Eagleby Wetland complex, is suggested to protect and enhance these environmental functions. Consider design and construction to avoid sediment and pollutant runoff impacts on fishery habitat and recreation services of the Logan and Albert Rivers. Consider design and location protects and enhances the Waterway corridor value as per the Logan City Council Planning Scheme. Mangroves and potential salt marsh also occur in the Coomera Connector footprint. Council suggests these ecosystems be protected where possible to ensure bank stability, fish habitat and other ecosystem processes.
Air Quality	<p>For both residential/commercial receptors and environment area receptors</p> <ul style="list-style-type: none"> Consider heavy particle movement and deposition during construction activities Possibly include plantings for pollutant entrapment adjacent to motorway and noise barriers to enhance air pollutant dispersion Consider planning for odour emissions from works involving acid sulphate soils.
Lighting	<ul style="list-style-type: none"> Suggest design takes into consideration effective screening for light to avoid exposure of the open and vegetated areas and nearby residents in Eagleby.
Transport Noise	<p>For residential receptors</p> <ul style="list-style-type: none"> Consider noise barriers to minimise noise impacts on local residents and protect amenity, incorporating environmental concepts and themes. Possibly include planting of boundaries to create vegetative screens. <p>For environmental receptors</p> <ul style="list-style-type: none"> Implement design and construction methods minimise the effect on fauna, especially local and migratory birds that use the wetlands.
Acid Sulphate Soils	<ul style="list-style-type: none"> Significant areas of potential acid sulphate soil (ASS) occur in the area. The water table is very close to the surface in this area. The local ecosystems are also adapted to the naturally acid conditions. There is a significant risk earthworks and construction activities could cause an increase in release of acids into the environment. Works should either avoid or minimise changes in the acidity of ground water and existing ecosystems. Treatment of ASS via the use of lime is to be carefully managed as the wetlands and waterway throughout the Eagleby area are critical habitat for acid frogs, which require slightly acidic conditions.

Recreational impacts	<ul style="list-style-type: none">• Recreational opportunities, both on land and water, are an important consideration for Logan residents.• Fisheries in the Albert and Logan rivers are considered an important commercial and recreational asset. Australian bass, long-finned eel, sea mullet, eel-tail catfish and spangled perch are species of recreational or commercial interest that are found in relative abundance in the Logan estuary. Design and construction methodologies could consider riparian and fish habitat enhancement, sediment effects, and careful consideration of acid sulphate soil management.

Map attachments



Biodiversity Corridor and Environmental Management Area

LEGEND:

- Coomera Connector
- Biodiversity corridor
- Environmental management and conservation area

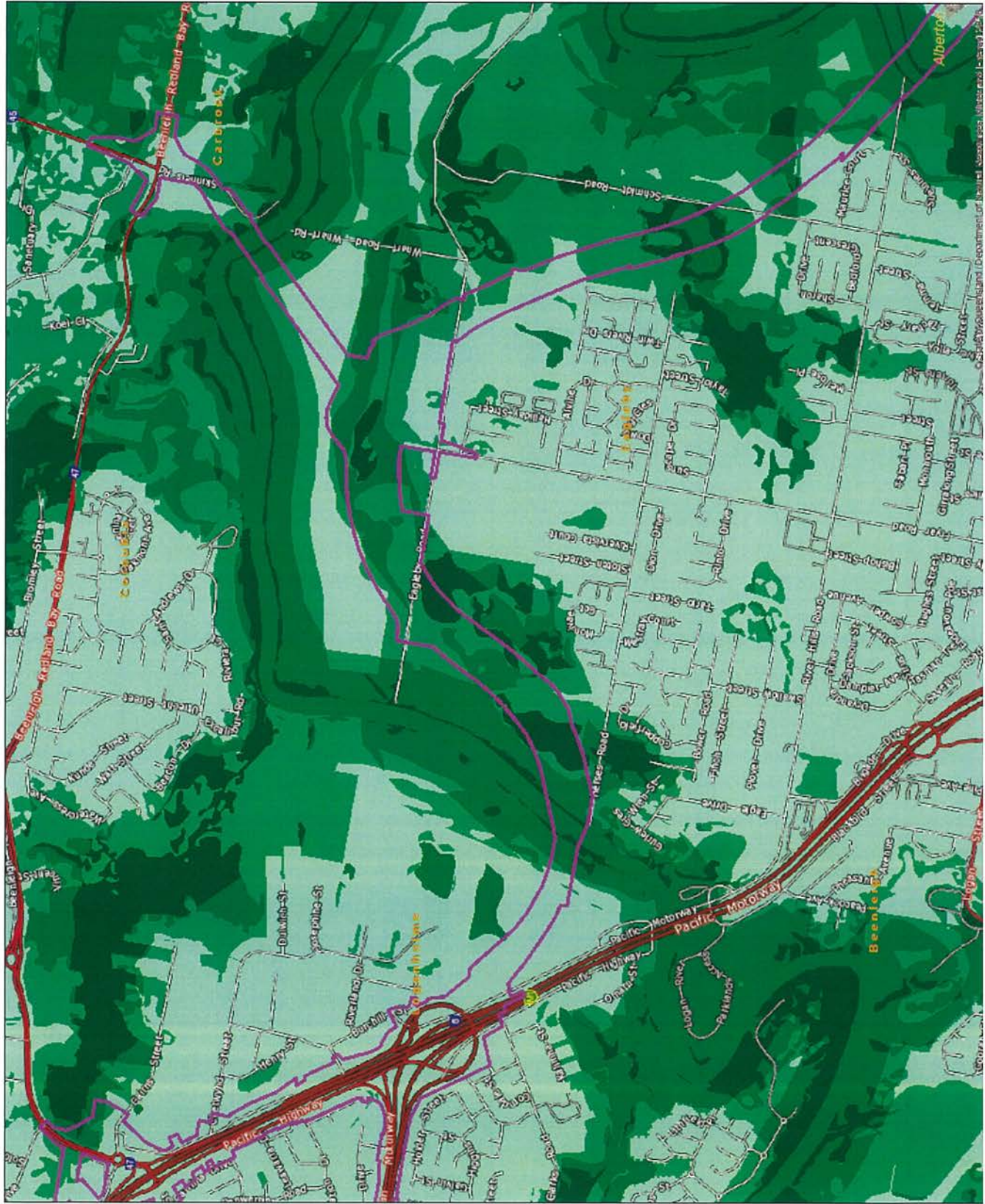
Map 1

DISCLAIMER:
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Scale: 1:10,000
Map Projection: Universal Transverse Mercator
Datum: GDA 1984
Contour: 1m





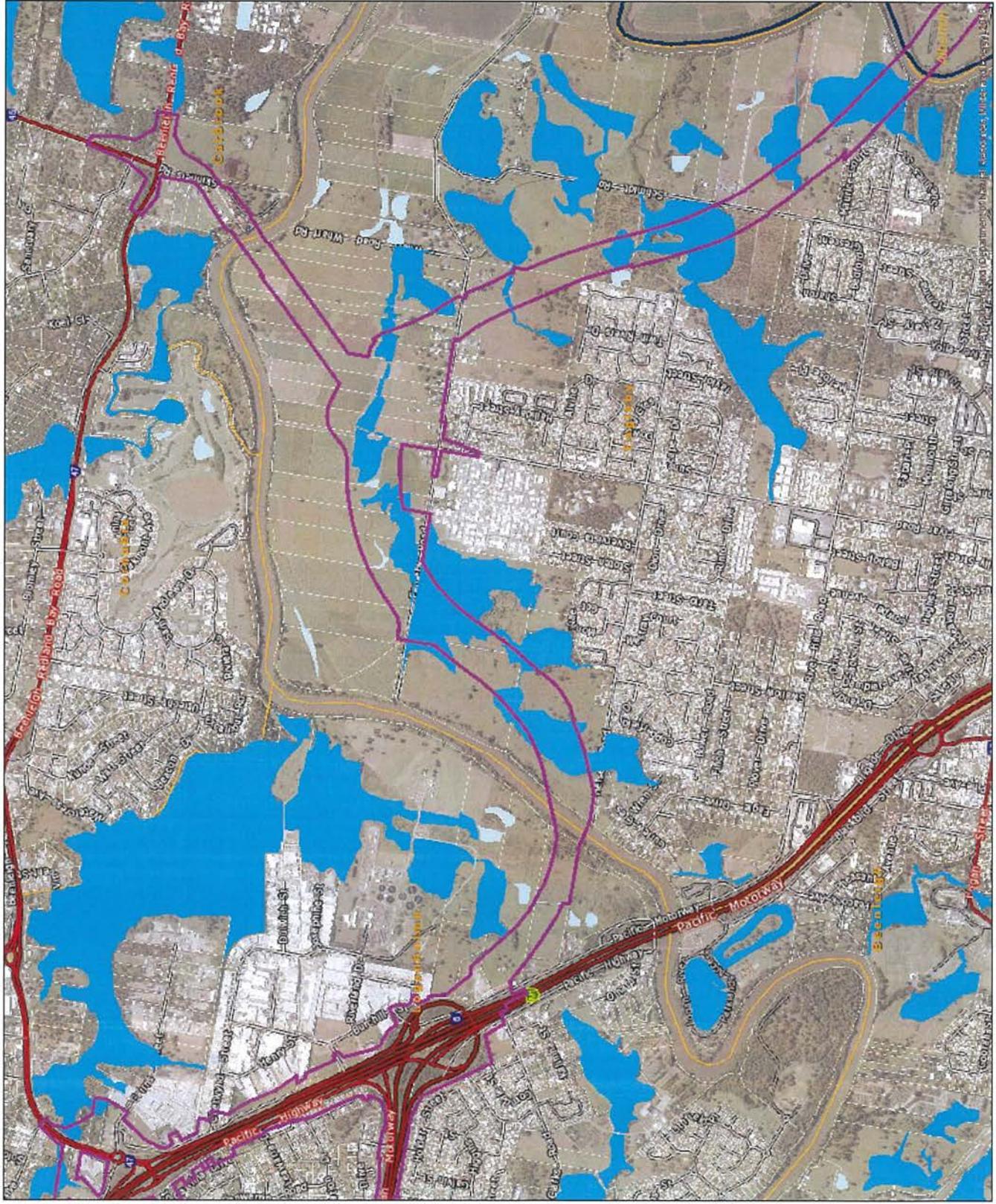


Map 4

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0 145 290 580 Miles
Scale: 1:17,000 at A3 size







LEGEND:

Coon Conn	Minor	Med	Major	River
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Age group	Number of people
0-14	100
15-24	150
25-34	200
35-44	250
45-54	300
55-64	350
65-74	380
75-84	350
85-94	300
95-104	250

 0 100 μm

Scale: 1:14,753 at A3 size

Map Projections Universal Transverse Mercator





LEGEND:
 Corridor
 Flooding and inundation area

Map 7

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Scale 1:14,725 at A3 size
 0 125 250 500 Metres

Map 7: Logan City Flood Hazard Map
 Prepared by Logan City Council
 Date: 2017

