

Department of Transport and Main Roads  
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9th February 2024

To whom it may concern

### **Submission: North Brisbane Bruce Highway Western Alternative – Stage 4**

Thank you for the opportunity to comment on the proposed corridor options for Stage 4 of the Bruce Highway Western Alternative (BHWA) between Beerburrum and Moodlu.

Queensland Conservation Council (QCC) is Queensland's peak environmental advocacy group, representing over 60 member groups with a combined membership representing more than 20,000 individuals across Queensland. Since 1969 our mission has been to protect the environment, wildlife and landscapes, conserve our precious natural resources and make Queensland governments, businesses and communities more sustainable.

### **The proposed development of the Bruce Highway Western Alternative**

QCC does not support the development of a Bruce Highway western alternative.

The key justifications given for this proposal include: increasing carrying capacity; increasing traffic flow; reduced travel time and network efficiency.

Potential population growth itself should not dictate the significant expansion and wasteful duplication of existing road networks. The international and domestic experience, and research of the last twenty years has clearly shown that prioritising this focus in transport planning does little to meet such stated goals due to the *induced demand* effect.<sup>1</sup> Indeed some of the most gridlocked cities in the world are those with the most extensive road networks.

### **South East Queensland (SEQ) at a tipping point**

In 2023 we released the independent report *Holding the Line: Reversing Biodiversity Decline*.<sup>2</sup> It highlights how SEQ has reached a critical point of just 35% remnant vegetation. With the significant

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<sup>1</sup> See: Beck, M. & Bliemer, M. (2015, April 13). Do more roads really mean less congestion for commuters?. *The Conversation*. <https://theconversation.com/do-more-roads-really-mean-less-congestion-for-commuters-39508> and J. Volker. et al. (2020). Induced Vehicle Travel in the Environmental Review Process. *Transportation Research Record*. 2674(7), 468-479. <https://journals.sagepub.com/doi/epub/10.1177/0361198120923365>

<sup>2</sup> Mooney, S. & Davidson, A. (2023). *Holding the Line: Reversing Biodiversity Decline*. [https://www.queenslandconservation.org.au/dire\\_threat\\_koalas\\_seq\\_urban\\_sprawl](https://www.queenslandconservation.org.au/dire_threat_koalas_seq_urban_sprawl)

housing and infrastructure development mooted in the near term, we risk this dropping below 30%, the estimated ecological tipping point where ecosystems start to lose their integrity and ability to provide intact habitat for species, and the ecosystem services upon which our communities rely, such as healthy water and air, and green space. That is, we risk ecosystem collapse.

SEQ is a globally recognised biodiversity hotspot. The eastern lowlands areas, where many people are choosing to live, are also one of the most fertile and productive regions for a variety of species in Australia, including the now endangered Koala.<sup>3</sup> It will also increasingly become an area of climate refugia as our state warms and the range of animal habitation retreats. It is unique, and damage cannot be “offset” or replaced by bushland or habitat on our ranges and to the west.

It is still possible to accommodate growth and retain our landscape integrity. But how we improve our transport systems going forward will be critical to this endeavour. One of the single most damaging impacts of infrastructure is not just the direct impact of clearing habitat and green space, but the way it is further fragmenting and carving up the landscape, slicing apart important ecosystems and reducing their ability or preventing them from functioning properly.

### **Improving planning, and the development of infrastructure**

We are very supportive of steps the State Government has taken to move the SEQ Regional Plan in the direction of higher density and infill development in order to accommodate growth. As, SGS Economics & Planning laid out in their expert report, *Best Practice Regional Planning for SEQ*, most relevantly we need to be aiming for:

- Settlement respecting the landscape, including integrating green infrastructure;
- Economic clusters, within poly-centric cities;
- Transport in support of connected and compact cities

The Bruce duplication as currently conceived risks entrenching historical patterns of planning and development that no longer serve us well. The SEQ region already has significant reliance on car travel to work, with the average in SEQ being 63.3% of the population, compared to Melbourne 50.9% and Sydney 37.8%.<sup>4</sup>

As SGS further states:

#### **Dispersed settlement and car dependency**

Dispersed settlement patterns risk the entrenchment of car dependency, which is not sustainable from an environmental nor social perspective. The SEQ region is already highly car dependent

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<sup>3</sup> Mooney & Davidson (2023). *Holding the Line*.

<sup>4</sup> SGS Economics and Planning. (2023). *Best Practice Regional Planning for SEQ*. p.31.

outside of inner-city locations, as evidenced by public transport and car travel to work data. As shown in Table 2, while areas closest to the Brisbane CBD tend to have higher rates of public transport usage (and consequently lower shares of car use), most areas in SEQ have lower rates than those seen across comparable metropolitan areas like Greater Sydney and Melbourne respectively.

This reflects a dispersed settlement pattern. It is also an outworking of key regional economic and other clusters of activity being relatively poorly serviced by structural public transport infrastructure. These include the Griffith University campuses, Maroochydore, and Chermside. Structural public transport infrastructure has the ability to shape the contours of economic activity within a city, clustering and connecting different land uses.<sup>5</sup>

The construction of large new roads must stop becoming the default response to address traffic congestion, or anticipated growth. More cars means more pollution, more congestion and more city car parks sitting idle for at least 50% of the time. It is failing to shape future development in ways more conducive to ensuring sustainable development and retaining the liveability of the region which we all love so much.

A choice has to be made. We have constrained financial and human capital. Improving the design and investment in public transport has to take precedence over duplication of roads. This includes significant improvement to rail between the Sunshine Coast and Brisbane, and the linked multi-modal network of transport options across the Sunshine Coast itself.

### **More sustainable responses & demand management**

Although mooted as the aspiration of the SEQ Regional Plan, we need more concerted planning and investment put into developing economic opportunities closer to where people live, instead of trying to funnel them into the Brisbane CBD.

We can also manage commute times and congestion through investing in a wider range of options, which could include but are not limited to:

- Encouraging development of remote working hubs (including further decentralising government) and continuing to promote telecommuting and flexible work arrangements
  - this could include involve improving productivity infrastructure close to home, such as broadband;
- Providing incentives for businesses that adopt remote work policies, such as tax breaks or subsidies;
- Supporting carpooling and Ride-Sharing Programs, such as with additional dedicated lanes; and in particular

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<sup>5</sup> SGS Economics and Planning. (2023). *Best Practice Regional Planning for SEQ*. p.30.

- Implementing Congestion Pricing, such as introducing congestion pricing policies to discourage single-occupancy vehicle use during peak hours; and
  - using the revenue generated from congestion pricing to fund sustainable transportation initiatives

In the inner city we should also continue to invest more heavily in bicycle and pedestrian Infrastructure.

### The proposed Stage 4 routes

Proposed Stage 4 runs through ecologically significant and sensitive areas. There are a range of Species or species habitats known to occur within the area that are matters of national environmental significance (MNES) and matters of state environmental significance (MSES).<sup>6</sup>

This includes wetlands, with local sightings of platypus, and mapped core koala habitat and possible habitat restoration areas. The Koala was uplisted to *endangered* in 2022, and the loss and fragmentation of Koala habitat is the leading cause of death and declining healthy populations.<sup>7</sup>

It is an opaque process, and unclear the weighting that TMR are giving to ecological values in the development of these proposed routes. There is not an easily accessible, public justification or methodology given for how these routes were arrived at. This undermines their credibility and impinges on the ability of stakeholders, including the community, to engage effectively and offer informed support for these proposals.

Sincerely



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<sup>6</sup> As revealed by various datasets including in Q Globe, the Atlas of Living Australia, Protected Matters Search Tool (EPBC), and additional local surveys undertaken by citizen science groups.

<sup>7</sup> Cox, L. (2022, February 11). Koala listed as endangered after Australian governments fail to halt its decline. *The Guardian*. [www.theguardian.com/environment/2022/feb/11/koala-listed-as-endangered-after-australian-governments-fail-to-halt-its-decline](https://www.theguardian.com/environment/2022/feb/11/koala-listed-as-endangered-after-australian-governments-fail-to-halt-its-decline)