

# ADDENDUM

## Western Downs Regional Council

### Dalby Cultural Centre – Thomas Jack Park

#### Further Concerns Regarding Engagement Presentation, Functional Change, and Planning Classification

## 1. Proportional Presentation of Community Engagement Findings

The Community Engagement Report & Site Analysis Study (June 2024) records the consideration:

“Should not take away existing green space” as receiving an average score of **4.06 out of 5**, indicating a **high** level of community importance.

In contrast, Council agenda materials for Ordinary Council Meeting May 2024 describe greenspace loss as “loss of some greenspace” within a list of site challenges. In some representations, this consideration appears to have been visually or narratively grouped **below** four stars.

The concern is not that greenspace loss was omitted, but that its recorded weighting may not have been proportionately reflected in summary materials presented to Councillors.

Where a **highly ranked community value** is framed as a **minor challenge**, questions arise regarding proportionality and balance in the presentation of engagement findings to decision-makers.

## 2. The 6.6% Footprint Representation

Council has publicly stated that the Cultural Centre footprint represents approximately 6.6% of Thomas Jack Park.

It is unclear whether this calculation includes only the primary building footprint or whether it also incorporates:

- Relocated playground infrastructure and required softfall areas,
- Relocated disability swing area,
- Water play hardscape,
- Multipurpose court surface,
- Barbecue and gathering hardscape,

- Central spine pathway construction,
- Loading and servicing zones,
- Associated infrastructure.

If the 6.6% figure reflects only the building footprint, it does not represent the total functional conversion of green space to built or hard-surfaced areas.

The issue is not numerical accuracy per se, but whether the public and Councillors were provided with a full accounting of total land-use change. This 6.6% figure was also published and promoted.

### 3. Functional and Character Change

Thomas Jack Park currently operates as:

- A shaded passive recreation space,
- An informal short-stay rest location for travellers,
- A site containing a timber rotunda,
- A park with an established lagoon ecosystem.

The proposed redevelopment includes:

- Removal of the rotunda,
- Removal of the gravel car park on Pratten Street,
- Removal of the existing public toilet block,
- Relocation of playground facilities,
- Introduction of water play infrastructure,
- Installation of a hard multipurpose court,
- Introduction of loading and delivery areas,
- Establishment of a central axial pedestrian spine.

Collectively, these elements represent not merely insertion of a building, but a shift *from passive and ecological amenity toward programmed and infrastructure-based use*.

This constitutes a **qualitative change in park character and function**.

## **4. Ecological Considerations**

The Master Plan imagery does not clearly indicate retention of the existing lagoon ecosystem on the Warrego/Drayton Street side.

If the lagoon is to be removed, filled, or permanently decommissioned, this would represent:

- Loss of aquatic habitat,
- Loss of birdlife support,
- Loss of biodiversity and cooling function.

A constructed splash water feature does not provide ecological equivalence to a natural lagoon.

Clarification of the lagoon's status and any environmental assessment undertaken would be relevant.

## **5. Planning Act 2016 – Change of Use Considerations**

Under the Planning Act 2016 (QLD), development classification and assessment pathways depend upon the nature and intensity of the proposed use relative to the existing lawful use of land.

While insertion of a community facility within parkland may be characterised as consistent with public purpose zoning, the cumulative elements described above raise a question as to whether the proposal represents:

- A minor ancillary addition to an existing park use, or
- A material change of use involving altered intensity, built form, servicing infrastructure, and functional character.

Particularly relevant considerations include:

- Removal of established passive recreation infrastructure,
- Introduction of commercial-like visitor traffic patterns,
- Structured servicing and delivery requirements,
- Displacement of informal rest-stop functionality.

The question is not whether Council has the power to approve the development, but whether the scale and cumulative functional impacts have been appropriately characterised and assessed within the planning framework.

In circumstances where cumulative built form, servicing infrastructure, ecological alteration, and displacement of established passive park functions occur simultaneously, classification as a “minor change” warrants careful scrutiny.

## **6. Clarity of Public Documentation**

Review of Master Plan materials indicates:

- Minimal visual distinction of loading/delivery zones within treed areas,
- Legend inconsistencies, including omission of the disability swing from the map key.
- Limited clarity regarding ecological retention.

While these may be drafting issues, clarity and transparency are critical in public engagement documents.

## **7. Contextual Pattern**

These concerns should be considered alongside:

- The high 4.06 greenspace weighting in engagement,
- The framing of greenspace loss as a comparatively minor challenge,
- The reliance on the 6.6% footprint representation,
- The absence of clearly documented post-implementation evaluation of comparable projects.

The cumulative issue is one of proportionality, transparency, and characterisation of impact.