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5 June 2026

Honourable Jarrod Bleijie MP, Deputy Premier
Minister for State Development, Infrastructure and Planning
Minister for Industrial Relations
Queensland Government
PO Box 15009
CITY EAST QLD 4002

By email: deputy.premier@ministerial.qld.gov.au

Dear Deputy Premier Bleijie

**RE: LOGAN CITY COUNCIL - LOGAN AND ALBERT RIVERS FLOOD STUDY REVIEW, REPORT NO 2026/01
AND RELEVANT POLICY COMMENTS FOR CONSIDERATION IN RELATION TO FLOOD PLANNING**

I write to you on behalf of the Logan Community Alliance Inc in relation to the proposed flood planning changes and in response to the recently published results of the independent review commissioned by Logan City Council into the Logan and Albert Rivers Flood Study.

The Logan Community Alliance (LCA) is a small, independent group of Logan residents committed to understanding how Logan City Council operates and ensuring that decisions affecting the community are transparent, evidence-based, and accountable. We are not affiliated with Council and are not a political party.

Our organisation was established in response to concerns arising from the proposed flood mapping and planning scheme changes, and how those changes impact us personally as well as the broader Logan community. We formally incorporated on 13 March 2026. Since that time, we have worked collaboratively with community members and independent experts across a range of disciplines to better understand the technical, planning, legal, social, and economic implications of the proposed changes.

The LCA acknowledges the considerable work undertaken to date by Logan City Council and its consultants in preparing the Logan and Albert Rivers Flood Study and associated flood mapping updates. We also acknowledge Council's decision to commission the independent review undertaken by Restore Blue in response to community feedback. The decision to undertake an independent review and publicly release the findings represents an important step towards transparency and accountability in a matter of significant public interest.

This submission has been prepared to provide constructive feedback and information to assist Council, elected representatives, and the Queensland Government in making informed policy decisions. It offers observations on the technical reviews undertaken to date, identifies areas where further scrutiny may be warranted, and outlines policy considerations that we believe require careful evaluation before any planning scheme amendments are finalised.

Importantly, the majority of concerns identified **do not originate from community speculation but arise directly from issues identified by respected, professional reviewers engaged throughout the flood study**

process, including Water Technology, Don Carroll Project Management, and Restore Blue. These reviews collectively identify substantial unresolved uncertainties that warrant further consideration before significant planning decisions are finalised.

We are seeking your assistance in ensuring that Logan City Council fully acknowledges the scope of the concerns raised and is supported to implement meaningful policy changes that more comprehensively address those concerns.

Given that the implementation of the new Logan City Plan has now been deferred until 2030, the limited amendments proposed at the Special Council Meeting (4 June 2026) do not adequately address the issues identified. Without further reform, Logan residents will remain in a prolonged state of uncertainty, lacking meaningful policy changes that would enable the effective application of a performance-based planning approach. In our view, the current proposal requires a fundamental redesign rather than incremental adjustments at the margins.

A detailed review of the available technical documentation, independent reviews, and planning policy framework, clearly shows that significant concerns remain regarding both the underlying flood study methodology and the manner in which the resulting flood mapping is proposed to be implemented through the Draft Logan Planning Scheme and interim Temporary Local Planning Instrument.

The unresolved uncertainties identified relate to a range of technical matters, including:

- historical flood calibration and calibration methodology;
- flood frequency analysis of future events;
- source information integrity and suitability;
- climate change assumptions; and
- future flood level heights and extent estimates.

While the Restore Blue review confirms that the “overall approach of the WRM Report flood study is sound,” it does not state that the underlying inputs, assumptions, or outcomes are technically sound - a point which we feel has been overlooked by Logan City Council. This is evidenced through consistent statements made by Mayor Raven that the ‘modelling is sound’ along with the narrow breadth of policy changes proposed at the Special Council Meeting (4 June 2026), which failed to specifically address any of the technical concerns raised by the reviewers of the underpinning flood study.

Reviewers have identified areas where additional investigation is likely to provide significant improvements to modelling accuracy and credibility. These issues do not necessarily invalidate the modelling framework but are sufficiently material to justify further targeted review before significant planning decisions are made based on their results.

The social and economic consequences of the proposed changes should not be underestimated. Impacted community members have reported experiencing significant declines in property values, reduced development opportunities, insurance impacts, financial hardship, and uncertainty regarding future land use rights. This has created genuine distress within the community. Many affected residents are long-term homeowners, retirees, families, and rural-residential landowners whose homes represent their primary financial asset and future security.

As you have acknowledged in previous correspondence, the proposed planning framework raises broader concerns regarding housing supply and diversity. Restrictive flood planning provisions may unnecessarily limit opportunities for secondary dwellings, extensions, intergenerational housing, and other forms of low-cost housing that are increasingly important during a period of significant housing affordability pressures across

South East Queensland. These issues may have long-term social implications that have not been fully considered.

The available evidence suggests that the proposed planning framework places disproportionate reliance on land use planning controls as the primary mechanism for managing flood risk. Best-practice flood risk management guidance consistently identifies that, while land use planning is a valuable tool, it is only one component of what should form an integrated flood risk management strategy. This should also include a range of alternative flood risk control measures such as flood-resilient building design, infrastructure improvements, and ongoing catchment and infrastructure restoration and management.

Utilising planning controls as the primary flood risk management strategy risks placing the cost of achieving a broader public benefit disproportionately on a relatively small group of affected landowners, rather than sharing that burden fairly and equitably across the wider Logan community. In effect, the proposed approach transfers responsibility for broader catchment and flood management outcomes onto individual property owners, many of whom are the least capable of managing or mitigating those risks themselves. This raises important questions regarding equity, proportionality, and whether all feasible alternatives have been adequately considered.

The Queensland Government's flood study guidance material recognises community engagement as a critical component of successful flood studies, particularly during data collection, model calibration, and final mapping stages. Many residents feel that local knowledge, historical flood information, and lived experience have not been adequately incorporated into the process. Logan has a highly engaged and knowledgeable community that wants to contribute constructively to improving flood risk management outcomes, and we believe there is significant opportunity for Council to strengthen community confidence through more meaningful engagement and collaboration.

Logan has a genuine opportunity to become a leader in contemporary flood risk management. By combining technical excellence with meaningful community engagement, continuous model improvement, innovative mitigation strategies, practical planning outcomes, and balanced policy settings, Council can develop a framework that protects residents from flood risk while preserving housing opportunities, property rights, economic resilience, and community wellbeing.

To clearly address the identified issues, the attached response has been provided in two parts:

Part A – Technical Review Observations and Responses

Observations relating to the flood study reviews, peer review findings, technical issues, modelling assumptions, mapping outcomes, and areas requiring further investigation.

Part B – Policy Considerations

An examination of policy matters relating to planning, housing, insurance, economic, social, community, governance, and implementation matters relevant to the proposed planning scheme amendments and flood risk management framework.

We support the objective of improving community safety, strengthening flood resilience, and ensuring future development appropriately responds to flood risk. The decisions made through this process will have long-lasting consequences for thousands of Logan residents and will shape Logan's future for decades. It is therefore essential that they are supported by the most accurate and defensible information available, balanced policy settings, and genuine partnership with the community.

A copy of this submission has been provided to Mayor Jon Raven and all Logan City Councillors.

We thank you in advance for your consideration of the matters raised and would welcome the opportunity to engage further with you and the Department of State Development, Infrastructure and Planning on flood-related or broader planning issues.

Kindest Regards

A handwritten signature in black ink, appearing to read 'S. Thomas'.

Shelley Thomas

President

Logan Community Alliance Inc