



## Australian Institute of Architects

21 September 2015

Queen's Wharf Brisbane PDA  
Minister for Economic Development Queensland  
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### QUEEN'S WHARF BRISBANE PRIORITY DEVELOPMENT AREA (PDA) PROPOSED DEVELOPMENT SCHEME

Dear Minister

The planning instrument issued for public comment provides the people of Queensland with **inadequate protection and limited guarantees** that the Queensland Government Precinct (QGP) will be delivered in a proper form.

The QGP should be an exemplar of our heritage as the birthplace of this State. The vision should be for a public place that is open and inclusive; that preserves in a proper setting this very small pocket of what our origins as City makers once was; and that our protection of it as a cohesive whole demonstrates our collective governance skills as a community. The PDA opens the door for this precinct to be taken from the National Estate as an intact Colonial era precinct.

In an unprecedented display of concern with the proposed PDA, built-environment representative bodies have jointly prepared this submission to the Government. The professional Institutes are:

**Australian Institute of Architects**  
**Australian Institute of Landscape Architects**  
**Urban Design Alliance**

We act jointly and on behalf of the community who have not been adequately consulted with on the process of redeveloping the City's birthplace – the Queensland Government Precinct.

The scheme as presented is a disservice to the city of Brisbane, the city's business community, the Queensland Government and the people of Australia.

*It fails to provide a rational business case for this development.*

*It fails to present the scheme within the context of a coherent vision for the whole of Brisbane.*

*It fails to justify the selection of this site for the development.*

*It fails to demonstrate how the development will enhance the urban quality of the Government precinct.*

*It fails to explain how the City Centre will be affected in terms of traffic impacts.*

*It fails to explain how the project will be delivered and what guarantees of performance there are to the people of Queensland who are surrendering an important precinct to a private developer.*

We do not argue against appropriate and sensitive development in this precinct. Nor do we argue against the casino development on another more appropriate site. The Government precinct, however, is an unsuitable choice for such a large project as a casino.

The project is very high risk and there are insufficient safeguards in place with this "one roll of the dice".

Why is the project high risk?

- 1.0 What happens if the current project proponent fails to complete their scope of works such as in Adelaide where the proponent refused to deliver the public realm works? How does the Government protect itself from such an eventuality?
- 2.0 What happens if the venture fails entirely such as in Atlantic City USA (where it failed twice), a city of similar scale to Brisbane and a city without large tourism numbers? The State will end up with a set of buildings that have destroyed the public realm and can-not be readily repurposed.
- 3.0 What happens when the project proponent is unable to comply with the terms in the PDA? The current Echo scheme departs materially from the Draft PDA and in (our) view cannot possibly comply in its current form?

4.0 What happens when the Heritage protections afforded to all extant buildings in the precinct constrain the development? Will Government provide assurances they will not circumvent heritage measures that apply to all Queenslanders?

We reject the development proposal as presented. We would welcome the opportunity to discuss options for strategic interventions in the Government precinct to enable it to make a better contribution to the amenity of the city.

We also seek dialogue with the Government to explore more acceptable options on other sites more in need of intensive development of this kind.

Yours sincerely



**Richard Kirk FRAIA**  
President  
Qld Chapter  
Australian Institute of Architects



**Shannon Satherley**  
Qld Vice President  
Australian Institute of  
Landscape Architects



**Peter Edwards**  
Immediate Past  
Qld President  
Urban Design Alliance



**Australian  
Institute of  
Architects**



Australian Institute  
of Landscape Architects



CC:

**Hon. Anastacia Palaszczuk MP**, Premier of Queensland, Minister for the Arts and Member for Inala.

**Hon. Jackie Trad MP**, Deputy Premier, Minister for Transport, Minister for Infrastructure, Local Government and Planning and Minister for Trade. Member for South Brisbane.

**Hon. Dr Anthony Lynham MP**, Minister for State Development and Minister for Natural Resources and Mines.

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<b>Section Heading</b>	<b>Section Number</b>	<b>Instruction / Element / Criteria</b>	<b>Comment</b>
	1.5 State interests		We consider that 'relevant' State Interests are equivalent to those of the citizens of Queensland. The State Interests that have been considered need to be specified.
	1.6 Acknowledgements		The acknowledgements should be expanded as an appendix listing the agencies consulted and identifying those agencies/stakeholders specifically representing the community.
<b>Background</b>	2.1 Background	<p><b>Include</b> strategic context for the declaration of the PDA</p> <ul style="list-style-type: none"> <li>publicly accessible link to Master Planning, Urban Design and other studies that demonstrate the need for the project, vision and key principles.</li> </ul>	<ul style="list-style-type: none"> <li>The Government must make public the background information, market research, feasibility studies, site analysis, etc. that led to the decision that an 'integrated resort' solution is the best outcome for the QW site.</li> </ul>
<b>Land Use Plan</b>	3.1 Vision	<p><b>Review/reconsider/delete</b></p> <p>"...revitalise the south-western edge of the CBD as a tourism, recreation, cultural and entertainment destination for Brisbane."</p>	<ul style="list-style-type: none"> <li>Brisbane is our State Capital City, and the south-western edge of its CBD is its established commercial, administrative and symbolic heart;</li> <li>There are established and emerging tourism, recreation, cultural and entertainment precincts elsewhere in the city that could be further developed without restricting the best future use of the Queens Wharf precinct;</li> <li>The vision should set out higher level desires for the PDA rather than specific building types and uses.</li> </ul>
	3.1 Vision	<p><b>Revise to read</b></p> <p>"The redevelopment of this important part of the</p>	<ul style="list-style-type: none"> <li>If this list is to remain, at this point in the Vision statement, there is a need to include the</li> </ul>

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		city will provide the opportunity for a new integrated <del>resort</del> development with a range of related uses including <del>a casino</del> , function and entertainment facilities, hotels, retail, tourist attractions, cultural, convention, residential and recreation uses, <i>new pedestrian connection to South Bank, waterfront parkland and publicly accessible as well as expansive public realm.</i>	bridge to Southbank, the waterline parkland, and publicly accessible public realm as non-negotiable outcomes.
	3.1 Vision	<b>Delete</b> "casino"	<ul style="list-style-type: none"> <li>There is no need to specify that this precinct may contain a casino. This is facilitating land use not an outcome that is fundamentally necessary.</li> </ul>
	3.1 Vision	<b>Delete</b> "iconic contribution"	<ul style="list-style-type: none"> <li>"iconic contribution" is a meaningless and unprovable statement: development on this site needs to be an addition to the existing city form, not a stand-alone piece of architecture.</li> </ul>
	3.1 Vision	<b>Delete</b> "enhance connections to the waterfront" <b>Replace with</b> "maintain all existing connections, improve accessibility and add new choices for publicly available and accessible pedestrian connections between the CBD and the river front".	<ul style="list-style-type: none"> <li>"enhance connections to the waterfront" is too vague. The enhancements need to be specified.</li> </ul>
	3.1 Vision	<b>Include</b> "Deliver <i>fully approved</i> commercial, retail, civic, cultural, residential and community uses."	<ul style="list-style-type: none"> <li>All development within the PDA must be approved.</li> </ul>

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	3.2 Structural Elements	Structural Elements are summarised in Map 2	Amend the structure plan to Include the critical sections to make clear the vertical implications of the Land Use structure including constraints to building over streets, accessible connections to river, logical setbacks and built form responses to public realm.
	3.2.1 A vibrant core development	<p><b>Delete</b> “Delivers an activated, iconic core development with a range of uses which respond to the local context but also contribute to QWB PDA as a globally competitive tourist precinct.”</p> <p><b>]Replace with</b> “Delivers an activated development with a range of uses which respond to the local context of Brisbane CBD and the inner city.”</p>	<ul style="list-style-type: none"> <li>• Development within this site must not be undertaken in isolation.</li> <li>• Terms like 'iconic' and 'globally competitive' are marketing spin. They do not help to make the case for the proposed development.</li> </ul>
	3.2.1 A vibrant core development	<p><b>Delete</b> “Provides for unimpeded views from the core development to the Brisbane River and beyond to support the QWB PDA as an iconic tourist destination.”</p> <p><b>Replace with</b> “Acknowledges key view corridors into and across the site from the rest of the CBD, adjoining streets and land uses, the South-East Freeway, and the opposite side of the river, as well as within the site.”</p>	<ul style="list-style-type: none"> <li>• Only mentions views from the core of the development: needs to be a much more extensive visual discussion;</li> <li>• The diagram only has one viewpoint indicated which is completely unsatisfactory.</li> <li>• . Impacts of the proposal on visual amenity and landscape character should be addressed through a full Landscape and Visual Impact Assessment (LVIA) undertaken by a Registered Landscape Architect with experience in the assessment of such conditions.”</li> </ul> <p>No consideration is suggested about the presentation of culturally important sight lines or view corridors.</p>

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			Amend the structure plan to show culturally important view sheds and ascribe them as constraints.
	3.2.1 A vibrant core development	<b>Add</b> “Provides a range of dwelling types and sizes to facilitate social mix, meet changing demographic needs and opportunities for affordable living.”	<ul style="list-style-type: none"> <li>Residential use is mentioned only once in the Vision, with no other guidance as to the type, mix or location of housing to be provided.</li> <li>How is the residential component fundamental to the core proposal?</li> </ul>
	3.2.1 A vibrant core	Delivers an activated, iconic core development	<ul style="list-style-type: none"> <li>Shows the core development (Map2) directly over William Street – this is in conflict with best practice urban design principles. Streets that are open and connected to the sky should be a fundamental principle. An activated core must form an integral relationship to the street in dense urban environments. Street-based places are the most successful in the urban context. Internalised activation does not contribute to the success of its context.</li> <li>Amend the structure plan to shift the core of development onto existing parcels. Show William Street as an unimpeded street open to the sky.</li> </ul>
	3.2.2 Enhanced movement network	<b>Add</b> “Reinforce a robust and permeable movement network pattern connecting the surrounding city grid pattern.”	<ul style="list-style-type: none"> <li>The site must be designed as an extension of the CBD not a super-block.</li> </ul>
	3.2.2 Enhanced	<b>Delete</b>	<ul style="list-style-type: none"> <li>Mid-block connections on the diagram are not</li> </ul>

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	movement network	<p>“Enhances pedestrian permeability within the PDA with a number of important mid-block connections and a shared zone environment along Queen's Wharf Road.”</p> <p><b>Replace with</b></p> <p>“Enhances pedestrian permeability within the PDA by retaining existing mid-block connections creating new ones that are publicly accessible at all times and relate to the existing urban grid and city fabric.”</p> <p><b>And</b></p> <p>“Create a shared zone environment along Queen's Wharf Road.”</p>	<p>clear: most already exist;</p> <ul style="list-style-type: none"> <li>• The character and accessibility of the mid-block connections is not expressed: the existing ones are currently accessible to the public around the clock.</li> <li>• Is the bridge to be accessible to bikes?</li> </ul>
	3.2.2 Enhanced movement network	<p><b>Clarify</b></p> <p>“Provides improved pedestrian connections to public transport including ferry terminals.”</p>	<ul style="list-style-type: none"> <li>• The Land Use Plan does not describe or show how public transport to be integrated, apart from ferry terminals.</li> </ul>
	3.2.2 Enhanced movement network	<p><b>Revise to read</b></p> <p>“Improves pedestrian <i>and bicycle</i> connectivity from the QWB PDA across the Brisbane River to the South Bank Parklands and the Cultural Precinct.”</p>	<ul style="list-style-type: none"> <li>• New bridge connection must allow for bicycle use.</li> </ul>
	3.2.2 Enhanced movement network	<p><b>Clarify</b></p> <p>“Improves significant intersections and other intersections where required to provide for increased vehicle movements as well as enhance the pedestrian experience in the PDA.”</p>	<ul style="list-style-type: none"> <li>• How are “significant intersections” being improved? Does this only apply to vehicular traffic? There is only mention later of a scramble crossing. How is bicycle access being encouraged and provided for?</li> <li>• Where can the “increased vehicle movements” be assessed? How much extra traffic will be generated on local streets and how will parking affect the use of the existing streets and traffic movement?</li> </ul>

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	3.2.2 Enhanced movement network	<b>Add</b> "Avoids 'undergrounding' or covering of any public streets."	<ul style="list-style-type: none"> <li>The core development is shown straddling William Street: it is not demonstrated how this improves public connections, what commitment will be given to keeping this open at all times (as opposed to being closed for security, special events, servicing reasons, etc.) and what will be the character of the environment under the building to avoid this being intimidating, and not an unwashed / dusty / outlet for services / fans / emergency access.</li> </ul>
	3.2.2 Enhanced Movement Network	Enhances pedestrian permeability  Amend the structure plan to show additional pedestrian cross block linkages from George Street to the River edge.	The structure plan shows existing pedestrian permeability. Where are the enhancements? Additional cross block linkages should be indicated. Better connectivity between George Street, William Street and the river's edge should be enshrined as a structural element. There is no indication of the implication to vertical movement. This is omitted but has real implication to the movement network.
	3.2.2 Enhanced Movement Network	Improves significant intersections and other intersections where required to provide for increased vehicle movements  Amend a follows; Improves the pedestrian experience and public realm quality at significant intersections. Assures that the impacts of increased vehicle movements are distributed and have minimal disruption to the	This is counter-intuitive. Intersections are seldom 'improved' by providing increased vehicle movements. This is a major liability in the structural elements. Assurance should be stated to preserve the geometric integrity of two of the city's most important streets. Unfortunate outcomes similar to the Victoria Bridge/North Quay interface should be avoided in the culturally sensitive heritage precinct. The heritage value of

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		pedestrian experience	buildings is intrinsically linked to their relationship to the street. What of the tuff kerb stones?
	3.2.3 Heritage and cultural value	<b>Add</b> "Respects the significant cultural and historic context, and original uses of the heritage precinct."	<ul style="list-style-type: none"> <li>• Current and future use of heritage listed buildings as a casino is unacceptable.</li> </ul>
	3.2.3 Heritage and cultural value		<ul style="list-style-type: none"> <li>• The adaptive re-use (nothing spelt out) seems to be limited to a shuffling of existing uses and substantially increased commercial and hospitality. No significant public use is proposed</li> <li>• The AIA want to commend Echo for their care of the Treasury, former Lands Administration and former Library Buildings as well as Queen's Gardens under the present Casino arrangements. The institute strongly urges the Government to maintain these existing conditions for the new Queen's Wharf Development.</li> <li>• The 'conservation and adaptive reuse of heritage places to enhance and celebrate the rich cultural heritage aspects in and around the PDA' is an aspect of extreme concern. In clearing the site for the proposed development, three generations of major government office buildings are proposed for demolition. All of these buildings won architectural awards in their day and in time would be worthy of heritage listing. Arguably this is the case now. The Neville Bonner</li> </ul>

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			<p>Building and 80 George St are nationally important – the latter possibly internationally significant as the realized component of a design by Walter Netsch, the innovative partner of Skidmore Owings &amp; Merrill (SOM), at that time one of the most famous architectural practices in the world. The involvement of SOM and Walter Netsch was no accident. At that time the Queensland Government sought the input of a firm of world standing. Despite all the hype and barrage of advertising, that cannot be said of the present proposal. Such wholesale demolition of major public buildings does not occur in any city which seriously intends to attract tourists. The historic grain which 'Queen's Wharf' seeks to promote depends on the incremental positive development of Brisbane, not the obliteration of a half-century of creditable development. These buildings tell a story which is not only about architecture, but also urban design and social planning. Their collective demolition will result in visual amnesia at the core of Queensland's capital city. The engineering significance of the Riverside Expressway also needs to be respected. It was designed by Queensland engineers, who were at that time of international standing.</p>
	3.2.4 Public realm	<p><b>Revise</b> "Maintains and enhances existing parks, <i>with no</i></p>	<ul style="list-style-type: none"> <li>Existing public parks must remain in public ownership and public use</li> </ul>

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		<i>loss of useable, publicly accessible area, to provide connectivity to the core of the precinct and contribute to activity within the PDA.”</i>	<ul style="list-style-type: none"> <li>• A designated quantity of new public realm land needs to be handed over as a public asset once constructed</li> </ul>
	3.2.4 Public realm	<p><b>Add</b> “Establishes new, improved and different types of public realm spaces across the PDA which are <i>predominantly publicly owned, entirely publicly accessible</i> and provide for a range of cultural events as well as recreational, tourism, entertainment and other activities.”</p>	<ul style="list-style-type: none"> <li>• The public realm spaces are described as “publicly accessible”. To what degree is this land allocation publicly accessible – entirely? Or are there restrictions to its use. Will the land be, handed over as public land? Or is it to be privately owned, publicly accessible land.</li> <li>• 'Predominantly' qualifies public ownership and needs to be specified</li> </ul>
	3.2.4 Public realm	<p><b>Add</b> “The public realm will be a safe, inclusive and appealing environment for residents, visitors and workers, both day and night. Careful planning and design will ensure local streets, parkland and open spaces are integrated with surrounding land uses, have a wide range of activities and will be highly valued by the community.”</p>	<ul style="list-style-type: none"> <li>• Provide safety, variety and inclusivity through design.</li> </ul>
	3.2.4 Public Realm	<p>- Add the following;</p> <ul style="list-style-type: none"> <li>- Public realm should be integrated with the street.</li> <li>- Grade separation should be avoided.</li> <li>- Street frontages should provide continuous activation with regular entry points (this distance is typically specified in EDQ codes and guidelines)</li> </ul>	<p>There is no comment in this structural element that reflects best practice urban design in the proposals for the public realm.</p>
	3.2.4 Public Realm		<ul style="list-style-type: none"> <li>• The ‘new, improved and different types of</li> </ul>

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			<p>public realm spaces across the PDA' need to be spelt out. The words are spin and in all probability unlikely to be realized. What is public and what is private space? It is fragmented open-space 'activated and enhanced with retail, residential and commercial activity' and with the Riverside Expressway, environmentally impaired. Old types of 'public realm spaces' such as squares, footpaths, parks are superior. If the space was – say a whole block – as a flexible, usable public square, it would be a significant improvement to the CBD.</p>
	3.2.5 Environmental value	<p><b>Add</b> "Provides net increase of bio-diversity within the site. Deep planting zones to accommodate large trees are intrinsic to climatic requirements of the site."</p>	<ul style="list-style-type: none"> <li>• There must be, at minimum, an increase of bio-diversity to a new city site. Deep planting is essential in the achievement of bio-diversity and the mitigation of negative climactic impacts, in accordance with current rating tools such as Green Star and LEED.</li> </ul>
	3.2.5 Environmental value		<ul style="list-style-type: none"> <li>• Any protection of the 'natural and cultural values of the Brisbane River' is marginal and may not be true. How does infilling of the river protect its natural value?</li> <li>• What is the point of providing 'environmentally-sensitive low scale commercial, retail and community related development on or directly adjacent to the Brisbane River' in a location which is itself, environmentally degraded? One doesn't counter-balance the other. Attempts to</li> </ul>

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			mitigate the deficiencies are limited to noise and possibly chemical pollution. The overshadowing and exposure to adverse climatic conditions cannot be overcome. The limited rectification will impact on one of the last best views in Brisbane – from the Riverside Expressway.
	3.0 Map 2	Describe the degree of allowable penetration of the air rights space above public streets, highways and related infrastructure.	Map 1 is deficient in that the presence of the Victoria Bridge and the Riverside Freeway are not included. Their presence will have a significant impact on the proposed development.
			Map 2 is deficient and would benefit from including: <ul style="list-style-type: none"> <li>• adjacent heritage assets such as Parliament House which establishes key view corridors and spatial and formal relationships,</li> <li>• parks as heritage assets – including the adjacent Botanic Gardens</li> <li>• the footprint of those existing buildings to be demolished to make way for the development</li> <li>• the footprint of the 1 William Street Government Offices which will have a significant physical interrelationship with the proposed development.</li> </ul>
	3.4.8 Notification requirements	<b>Add</b> “A design review panel for the QWB PDA will be established. The panel will report to the MEDQ and	<ul style="list-style-type: none"> <li>• Independent and impartial design review is imperative for development on such a significant site.</li> </ul>

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		be paid, independently chaired, and impartial. It will evaluate the design quality of development proposals against the PDA.”	
	3.4.8 Notification requirements	<b>Amend</b> “All PDA development application’s will require public notification if the application includes a proposal that compromises the implementation of the scheme and / or is for development which in the opinion of the MEDQ, may have adverse impacts on the amenity or development potential of adjoining land under separate ownership.”	<ul style="list-style-type: none"> <li>• There is an expectation for transparency in the development process;</li> <li>• All development on this significant site should be publicly notified.</li> </ul>
	3.4.8 Notification requirements	<b>Add</b> “The MEDQ may require public notification in other circumstances if the development application is for a use or of a size or nature which, in the opinion of the MEDQ, warrants public notification.”	<ul style="list-style-type: none"> <li>• There is an expectation for transparency in the development process;</li> <li>• All development on this significant site should be publicly notified.</li> </ul>
	3.5 PDA-wide criteria		The criteria listed are normative and well-meaning in their compass. Their value and relevance will be determined by how they are interpreted and applied. It is difficult to reconcile the stated criteria with what is known of the Echo proposal for the development.
	3.5.1 Urban Design	<b>Add</b> “Reflects the role of the precinct as the commercial, administrative and symbolic heart of Brisbane as Queensland’s Capital City”	<ul style="list-style-type: none"> <li>• Brisbane is our State Capital City, and the south-western edge of its CBD is its established commercial, administrative and symbolic heart;</li> <li>• There are established and emerging tourism, recreation, cultural and entertainment precincts elsewhere in the city that could be</li> </ul>

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			further developed without restricting the best future use of the Queens Wharf precinct.
	3.5.1 Urban Design	<b>Add</b> “References the Brisbane City Council City Centre Master Plan and other associated studies and reports, in particular regarding the appropriate mass and scale of development within the CBD.”	<ul style="list-style-type: none"> <li>This plan has been through extensive engagement with the community, consultation and approvals and should be a starting point for any QW development proposal.</li> </ul>
	3.5.1 Urban Design	<b>Add</b> “References the Subtropical Design Handbook published by the Centre for Subtropical Design.”	<ul style="list-style-type: none"> <li>This document is endorsed at State and Local level.</li> </ul>
	3.5.1 Urban Design	<b>Add</b> “Acknowledges key view corridors into and across the site from the rest of the CBD, adjoining streets and land uses, the South-East Freeway, and the opposite side of the river, as well as within the site.”	<ul style="list-style-type: none"> <li>The Structural Elements Plan only mentions views from the core of the development: there needs to be a much more extensive explanation of impacts on views;</li> <li>The Plan only has one viewpoint indicated - this is completely unsatisfactory.</li> </ul>
	3.5.1 Urban Design	<p><b>Delete</b> All unquantifiable statements and terms, including, but not limited to:</p> <ul style="list-style-type: none"> <li>“recognisable local identity’</li> <li>“ best practice urban design outcomes”</li> <li>”landmark subtropical architecture and landscaping”</li> <li>“Appealing inclusive and vibrant environment”</li> <li>“ fine-grain uses”</li> </ul> <p><b>Add</b> “A Public Realm Master Plan and Design Guidelines</p>	<ul style="list-style-type: none"> <li>There is generally no way for the community or the Minister to be able to judge most of these statements without some guiding design criteria.</li> </ul>

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		document must be produced as part of the Infrastructure Plan to explain and define the intended urban design outcomes.”	
	3.5.1 Urban design	<p><b>Add</b></p> <ul style="list-style-type: none"> <li>- “Streets are not built over and are open to the sky.”</li> <li>- “Public realm is integrated with the street and not grade separated”</li> <li>- “Cross block pedestrian connectivity is provided at no more than 100m intervals”</li> </ul>	<p>These criteria are generally good and in line with best practice. They in many ways conflict with the preferred scheme so, unless they are churlishly proposed, the current preferred scheme will have to be significantly adjusted to properly respond to these criteria.</p> <p>The sanctity of the street is paramount. Add criteria that proscribe building over streets and diminution of their integrity.</p>
	3.5.2 Built form	<p><b>Reconsider</b></p> <p>“is sensitive to the interface and relationship with heritage places including building separation where appropriate”</p>	<ul style="list-style-type: none"> <li>• Provide specific criteria for interface requirements with adjacent/nearby heritage sites or those located within the precinct. For example: in what instances is building separation deemed appropriate and in what instances is not deemed appropriate?</li> </ul>
	3.5.2 Built form	<p><b>Reconsider</b></p> <p>“provides for conservation and adaptive re-use of heritage places in a way which enhances the vibrancy of the PDA”</p>	<ul style="list-style-type: none"> <li>• Provide more information on what is deemed acceptable ‘adaptive re-use’ of heritage sites – this is currently too vague.</li> </ul>
	3.5.2 Built form	<p><b>Revise</b></p> <p>“are of a height and scale that makes efficient use of land, is consistent with planned infrastructure <i>and the BCC City Centre Master Plan</i>, and commensurate with the site area”</p>	

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	3.5.2 Built form	<p><b>Revise</b> “provide active frontages which relate to the street and the wider CBD, <del>reinforcing the prevailing streetscape character</del> and contributing to creating an appropriate human scaled interface between buildings and the public realm including shade and shelter for pedestrians”</p>	<ul style="list-style-type: none"> <li>• Prevailing is synonymous with “current” which could be interpreted a number of ways: this is not what is wanted as an outcome. This section should rather be a reference to the CBD and its relationship to the rest of the city.</li> </ul>
	3.5.2 Built form	<p><b>Delete</b> “consider overshadowing principles, promoting penetration of winter sunlight to the public realm on the river edge and to the streets”</p> <p><b>Replace with</b> “respond to a comprehensive overshadowing study which explores the effect on the neighbouring streets, existing developments, the botanic gardens and heritage buildings”</p>	<ul style="list-style-type: none"> <li>• Built form needs to do more than “consider”: a comprehensive study is required.</li> </ul>
	3.5.2 Built form	<p><b>Delete</b> “where building over William Street”</p> <p><b>Add</b> “buildings shall not span across the road reserve of William Street”</p>	<ul style="list-style-type: none"> <li>• Specific criteria for building over William street are inadequate, open ended (“promote” / “maximise” / “respect”) and will not necessarily result in a quality public realm, therefore are not valuable as a guide to community expectations for this key city street.</li> </ul>
	3.5.2 Built Form	<p>Provide active frontages which relate to the street, reinforcing the prevailing streetscape character and contributing to creating an appropriate human scaled interface between buildings and the public realm including shade and shelter for pedestrians</p> <p><b>Amend as;</b></p>	<p>Prominent buildings fronting this reach of the river replay the city grid in the geometry which provides clarity and legibility in the city’s built form.</p>

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		<p>Provide active frontages which relate to the street, reinforcing the prevailing streetscape character and contributing to creating an appropriate human scaled interface between buildings and the public realm including shade and shelter for pedestrians. Building form should be built using orthogonal geometry that responds to the city street grid to reinforce legibility and clarity of the city form and the primacy of the city streets.</p>	
		<p><b>Delete this passage:</b>  <del>Where building over William Street:</del></p> <ul style="list-style-type: none"> <li><del>— Promote visual and natural light permeability</del></li> <li><del>— maximise clearance from the ground plane</del></li> <li><del>— minimise the footprint and visual impact</del></li> <li><del>— provide an activated and public streetscape at the ground level and podia</del></li> <li><del>- respect the relationship and interface with any adjoining heritage places and seek to minimise adverse impacts on the cultural heritage significance of the area.</del></li> </ul> <p><b>And replace with:</b>  For all streets, enhance their cultural importance and primacy in the city built form by reinforcing spatial integrity, access to light and ventilation, public realm and pedestrian amenity :</p> <ul style="list-style-type: none"> <li>- Assure integrity of visual and natural light permeability</li> <li>- No building beyond the boundary</li> <li>- Remove buildings over Margaret Street and re-establish the integrity of its streetscape</li> </ul>	<p>This section presumes that William Street is to be built over by any entity – this would violate best practice urban design principles and not meet heritage requirements to preserve the urban setting of the precinct of which the streets are the essential organising device. It is also advisable not to embed in the planning instrument poor design solutions. It is not a given that the current proponent will delivery all or any of the proposal.</p>

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		<ul style="list-style-type: none"> <li>- provide an activated and public streetscape at the ground level</li> <li>- respect the relationship and interface with any adjoining heritage places and seek to minimise adverse impacts on the cultural heritage significance of the area.</li> </ul>	
	3.5.4 Public realm	<p><b>Delete</b> All unquantifiable statements and terms, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• “local identity and distinctiveness”</li> <li>• “small scale built form”</li> </ul> <p><b>Add</b> “A design guidelines document must be produced as part of the Infrastructure Plan to explain and define the intended urban design outcomes.”</p>	<ul style="list-style-type: none"> <li>• There is generally no way for the community or the Minister to be able to judge most of these statements without some guiding design criteria.</li> </ul>
	3.5.4 Public realm	<p><b>Add</b> “is predominantly held in public ownership as a public asset”</p>	<ul style="list-style-type: none"> <li>• There must be adequate provision for a substantial portion of the public realm to be publicly owned, not just publicly accessible.</li> <li>• “Predominantly” needs to be defined.</li> </ul>
	3.5.4 Public realm	<p><b>Add</b> “is predominantly at grade and directly engages the street”</p>	<ul style="list-style-type: none"> <li>• The reliance on public places that are separated from the street in privatised space sets up that space for selective access rather than public access.</li> </ul>
	3.5.5 Environment and sustainability	<p><b>Revise</b> “maximise the opportunity to retain existing mature trees, remnant vegetation, marine plants and habitat for fauna where possible”.</p>	
	3.5.5 Environment and	<p><b>Revise</b></p>	<ul style="list-style-type: none"> <li>• A broader palette will be required to achieve</li> </ul>

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	sustainability	“incorporate landscaping with <del>endemic</del> <i>a mix of species that is</i> suitable to the conditions <i>and promotes biodiversity</i> , with a preference towards retaining existing vegetation where possible”	extensive podium planting, green walls and vertical gardens.
	3.5.6 Community safety and development constraints	<b>Revise</b> “ <i>managing</i> storm water regard to average recurrence intervals in a manner appropriate to the importance of the site, the adjacent buildings, the use of the public realm and the severity of potential damage to property, loss of amenity, illness or injury that would result from the failure of the system ”.	<ul style="list-style-type: none"> <li>Storm water may be managed in a variety of ways that provide environmental, health, recreational, educational and amenity benefits.</li> </ul>
<b>Infrastructure Plan</b>	Table 3 Infrastructure Plan	<b>Comment</b>	<ul style="list-style-type: none"> <li>Table 3 does not provide new or adequate information: the details column includes items that are already listed elsewhere, and is not comprehensive.</li> </ul>
	Table 3 Roads and intersections	<b>Delete</b> “Provide road and intersection upgrades as required by traffic studies undertaken by the applicant and approved by the MEDQ” <b>Replace with</b> “Undertake comprehensive traffic studies to analyse and understand the effects of proposed development on traffic congestion in the CBD and wider city.”	<ul style="list-style-type: none"> <li>The roads and intersections adjoining the site cannot be looked at in isolation.</li> </ul>
	Table 3 Roads and intersections	<b>Add</b> “provide on-street bicycle infrastructure”	
	Table 3 Roads and	<b>Add</b>	<ul style="list-style-type: none"> <li>Pedestrian overpasses and underpasses should</li> </ul>

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	intersections	“Upgrade to on-grade pedestrian links and crossovers impacted by the development. No overpasses or underpasses permissible as exclusive use spaces.”	not be allowed, as they preclude the integration of users into the city fabric. The negative spaces created are not sustainably safe in a passive and efficient way.
	Table 3 Public realm	<b>Add</b> “Retain and embellish the existing parks in the PDA to improve useability, with no loss of area.”	<ul style="list-style-type: none"> <li>• Embellishments to existing parks must enhance the parkland function.</li> <li>• Embellishments and use of existing parks must not diminish their potential as places for large public gatherings, including freedom-of-speech events and protests.</li> </ul>
	Table 3 Public realm	<b>Add</b> “a Public Realm Master Plan and Design Guide”.	
<b>Implementation Strategy</b>	5.1 Introduction	<b>Remove</b> “Delivering a world-class integrated resort development” <b>Replace with</b> “Delivering a new urban riverside precinct for the CBD of Brisbane, which will support economic, cultural and social development in accordance with the role of the city as the State capital, and with BCC City Centre Master Plan”.	<ul style="list-style-type: none"> <li>• This is an inappropriate land use for this site.</li> </ul>
	5.1 Introduction	<b>Add</b> “A separate, independent body will be established to oversee implementation of the strategy. Its responsibilities will include: <ul style="list-style-type: none"> <li>• Promoting, facilitating, carrying out and controlling the development, disposal and management of land and other property within</li> </ul>	

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		<p>the PDA;</p> <ul style="list-style-type: none"> <li>• Achieving an appropriate balance between commercial and non-commercial functions;</li> <li>• Ensuring development in the PDA complements, rather than duplicates, other development in the inner city Brisbane area;</li> <li>• maximising public access and ownership; etc.</li> </ul>	
	5.1 Introduction		It is of note that all three areas of the implementation strategy could be achieved on other available sites within the city. They are not specific to the PDA location.
	5.2 Delivering a world-class integrated resort development	<p><b>Remove</b> “Deliver a casino to attract significant visitation from the international gaming market, including VIP facilities.”</p>	<ul style="list-style-type: none"> <li>• Not appropriate in this location, nor required – refer comments on Section 3.1 Vision</li> </ul>
	5.2 Delivering a world-class integrated resort development	<p><b>Add</b> Actions with relation to the provision of residential, eg: “Provides a range of dwelling types and sizes to facilitate social mix, meet changing demographic needs and opportunities for affordable living.”</p>	<ul style="list-style-type: none"> <li>• Residential use is mentioned only once in the Vision, with no other guidance as to the type, mix or location of housing to be provided.</li> </ul>
	5.2 Delivering a world-class integrated resort development		The overall document would benefit from a glossary that clearly defines such loose terms as “world-class”, “integrated resort development”, “iconic” and related descriptors, otherwise they are just marketing spin. A list of comparative, exemplary developments would assist in illustrating what urban design virtues are sought - if only as a reference.

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			The list of deliverable functional elements is solely directed to the tourism market and does not have broad appeal and value for the community as a whole.
	5.3 Delivering a high quality public realm	<b>Add</b> “Deliver a resilient and sustainable public realm.”	<ul style="list-style-type: none"> <li>• The project must encourage the investigation and application of sustainable design including, but not limited to, urban agriculture, green roofs, roof water and storm water capture and reuse, solar power and green infrastructure;</li> <li>• Refer to the Intensive Food Production Guide by City Projects Office, BCC, and the Concept Design Guidelines for Water Sensitive Urban Design by Healthy Waterways.</li> </ul>
	5.3 Delivering a high quality public realm	<b>Add</b> “Deliver and manage the public realm to ensure no overall loss of public access to existing public realm, and free public access 24 hours a day, 365 days a year.”	
	5.3 Delivering a high quality public realm	<b>Add</b> “Deliver public recreation facilities for the use and enjoyment of residents and visitors. These facilities may include, but are not limited to, public swimming pool, gymnasium, facilities for running / jogging, fitness and children’s play, with associated rest rooms.”	<ul style="list-style-type: none"> <li>• The project must deliver public benefits for residents and day-to-day users, not just resort guests.</li> </ul>
	5.3 Delivering a high quality public realm	<b>Amend</b> “Deliver interpretive signage through the QWB PDA	

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		that assists wayfinding. <del>and highlights the indigenous and colonial heritage of the precinct including the Brisbane River.</del>	
	5.3 Delivering a high quality public realm	<b>Add</b> “Acknowledge and celebrate the indigenous and colonial heritage of the precinct, including the Brisbane River, through sensitive and well-considered design in consultation with key stakeholders, indigenous reference group, and community.”	
	5.4 Conservation and adaptive re-use of heritage buildings and places	<b>Amend</b> “Provide for conservation and adaptive re-use of existing heritage places within the QWB PDA including activation with a range of uses including boutique retail, food and beverage outlets, offices or hotels <i>where deemed appropriate through consultation with expert heritage consultants and relevant statutory bodies.</i> ”	<ul style="list-style-type: none"> <li>• What is the rationale for proposing these uses as those most suitable for the adaptive re-use of these heritage places?</li> </ul>

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Add a specific new section that covers absence for integration with land use / transport integration planning references.

Such aspects should incorporate,

- PT (Public Transport) integration into the overall accessibility planning, covering bus, rail & taxi transport and particularly node locations and site interdependency impacts;
- Parking locations & capacities consistent with strategic CBD planning objectives;-
- Bikeway Network Integration;
- Regional transport network implications, given the scale and significance of this PDA;
- Pedestrianisation circulation planning, including minimisation (rather than total exclusion) of grade-separation with associated design for DDA / user-friendliness;