Section Heading	Section Number	Instruction	Comment
Background	2.1 Background	 Include (but stated as extrinsic to the PDS) strategic context for the declaration of the PDA publicly accessible link to Master Planning, Urban Design and other studies that demonstrate the need for the project, vision and key principles, particularly why an 'integrated resort' has been considered the best land use to catalyse reinvigoration of this section of the CBD 	 The Queensland Government has not released detailed studies that this PDA PDS is built upon; The Government must make public the background information, market research, feasibility studies, site analysis, that led to the decision that an 'integrated resort' solution is the best outcome for the QW site.
Land Use Plan	3.1 Vision	Review/reconsider/delete "revitalise the south-western edge of the CBD as a tourism, recreation, cultural and entertainment destination for Brisbane."	 Brisbane is our State Capital City, and the south-western edge of its CBD is its established commercial, administrative and symbolic heart; 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; The vision should set out higher level desires for the PDA rather than specific building types and uses.
	3.1 Vision	Revise to read "The redevelopment of this important part of the city will provide the opportunity for a new integrated resort development with a range of related uses including a casino, function and entertainment facilities, hotels, retail, tourist attractions, cultural, convention, residential and recreation uses, new pedestrian connection to South Bank, waterfront parkland and publicly accessible as well as expansive public realm.	If this list is to remain, at this point in the Vision statement, there is a need to include the bridge to Southbank, the waterline parkland, and publicly accessible public realm as unnegotiable outcomes.
	3.1 Vision	Delete "casino"	 There is no need to specify that this precinct must contain a casino. This is a facilitating land use not an outcome that is fundamentally necessary.

3.1 Vi	Delete "iconic contribution"	 "iconic contribution" s a meaningless and unprovable statement: development on this site needs to be an addition to the existing city form and not a stand alone piece of architecture.
3.1 Vis	"enhance connections to the waterfront" Replace with "maintain all existing connections, improve accessibility and add new choices for publicly avaind accessible pedestrian connections between to CBD and the river front"	
3.1 Vi	"Deliver fully approved commercial, retail, civic, cultural, residential and community uses."	All development within the PDA must be approved.
core	Delete "Delivers an activated, iconic core development range of uses which respond to the local context also contribute to QWB PDA as a globally competourist precinct." Replace with "Delivers an activated development with a range uses which respond to the local context of Brisba CBD and the inner city."	but titive of
core	Provides for unimpeded views from the core development to the Brisbane River and beyond to support the QWB PDA as an iconic tourist destination." Replace with "Acknowedges key view corridors into and across site from the rest of the CBD, adjoining streets and land uses, the South-East Freeway, and the opposide of the river, as well as within the site. Impact	completely unsatisfactory. s the nd site

	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."	
3.2.1 A vibrant core development	Add "Provides a range of dwelling types and sizes to facilitate social mix, meet changing demographic needs and opportunities for affordable living."	 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.
3.2.2 Enhanced movement network	Add "Reinforce a robust and permeable movement network pattern connecting the surround city grid pattern."	• The site must be designed as an extension of the CBD not a super-block.
3.2.2 Enhanced movement network	"Enhances pedestrian permeability within the PDA with a number of important mid-block connections and a shared zone environment along Queen's Wharf Road." Replace with "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." And "Create a shared zone environment along Queen's Wharf Road."	 Midblock connections are not clear on the diagram: most are existing; The character and accessibility of the mid-block connections is not expressed: the existing ones are currently accessible to the public around the clock. Is the bridge to be accessible to bikes?
3.2.2 Enhanced movement network	Clarify "Provides improved pedestrian connections to public transport including ferry terminals."	The Land Use Plan does not describe or show how public transport to be integrated, apart from ferry terminals.
3.2.2 Enhanced	Revise to read "Improves pedestrian and bicycle connectivity from	New bridge connection must allow for bicycle use.

movement network	the QWB PDA across the Brisbane River to the South Bank Parklands and the Cultural Precinct."	
3.2.2 Enhanced movement network	Clarify "Improves significant intersections and other intersections where required to provide for increased vehicle movements as well as enhance the pedestrian experience in the PDA."	 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? 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?
3.2.2 Enhanced movement network	Add "Avoids 'undergrounding' or covering of any public streets."	• 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 e.g. security, special events, servicing reasons) 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.
3.2.3 Heritage and cultural value	Add "Respects the significant cultural and historic context, and original uses of the heritage precinct."	 Current and future use of heritage listed buildings as a casino is unacceptable.
3.2.4 Public realm	Revise "Maintains and enhances existing parks, with no loss of useable, publicly accessible area, to provide connectivity to the core of the precinct and contribute to activity within the PDA."	 Existing public parks must remain in public ownership and public use A designated quantity of new public realm land be handed over as a public asset once constructed
3.2.4 Public realm	Add "Establishes new, improved and different types of public realm spaces across the PDA which are predominantly publicly owned, entirely publicly accessible and provide for a range of cultural events as well as recreational, tourism, entertainment and	• 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.

		other activities."	
3.2.4 reals	1 Public m	"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."	Provide safety, variety and inclusivity through design.
3.2.5 Envi value	ronmental	Add "Provides net increase of bio-diversity within the site. Deep planting zones to accommodate large trees are intrinsic to climatic requirements of the site."	 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.
	3 fication iirements	Add "A design review panel for the QWB PDA will be established. The panel will report to the MEDQ and be paid, independently chaired, and impartial. It will evaluate the design quality of development proposals against the PDA."	Independent and impartial design review is imperative for development on such a significant site.
	fication iirements	Amend "A PDA development application will require public notification if the application: 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."	 There is an expectation for transparency in the development process; All development on this significant site should be publicly notified.
	3 fication iirements	Add "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	 There is an expectation for transparency in the development process; All development on this significant site should be publicly notified.

	MEDQ, warrants public notification."	
3.5.1 Urban Design	Add "Reflects the role of the precinct as the commercial, administrative and symbolic heart of Brisbane as Queensland's Capital City"	 Brisbane is our State Capital City, and the south-western edge of its CBD is its established commercial, administrative and symbolic heart; 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;
3.5.1 Urban Design	Add "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."	 This plan has been through extensive engagement with the community, consultation and approvals and should be a starting point.
3.5.1 Urban Design	Add "References the Subtropical Design Handbook published by the Centre for Subtropical Design."	This document is endorsed at State and Local level.
3.5.1 Urban Design	Add "Acknowedges 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."	 The Structural Elements Plan only mentions views from the core of the development: needs to be a much more extensive visual discussion; The Plan only has one viewpoint indicated which is completely unsatisfactory.
3.5.1 Urban Design	Delete All unquantifiable statements and terms, including, but not limited to: • "recognisable local identity' • "best practice urban design outcomes" • "landmark subtropical architecture and landscaping" • "Appealing inclusive and vibrant environment" • "fine-grain uses" Add	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.

	"A Public Realm Master Plan and Design Guidelines document must be produced as part of the Infrastructure Plan to explain and define the intended urban design outcomes."	
3.5.2 Built form	Reconsider "is sensitive to the interface and relationship with heritage places including building separation where appropriate"	 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 and appropriate and in what instances is not deemed appropriate?
3.5.2 Built form	Reconsider "provides for conservation and adaptive re-use of heritage places in a way which enhances the vibrancy of the PDA"	Provide more information on what is deemed acceptable 'adaptive re-use' of heritage sites – currently too vague.
3.5.2 Built form	Revise "are of a height and scale that makes efficient use of land, is consistent with planned infrastructure and the BCC City Centre Master Plan, and commensurate with the site area"	
3.5.2 Built form	Revise "provide active frontages which relate to the street and the wider CBD, 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"	 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 what the relationship to the rest of the city is.
3.5.2 Built form	 Delete "consider overshadowing principles, promoting penetration of winter sunlight to the public realm on the river edge and to the streets" Replace with "respond to a comprehensive overshadowing study 	Built form needs to do more than "consider": a comprehensive study is required.

	which explores the effect on the neighbouring streets, existing developments, the botanic gardens and heritage buildings"	
3.5.2 Built form	Delete "where building over William Street" Add "buildings shall not span across the road reserve of William Street"	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.
3.5.4 Public realm	Delete All unquantifiable statements and terms, including, but not limited to: • "local identity and distinctiveness" • "small scale built form" Add "A design guidelines document must be produced as part of the Infrastructure Plan to explain and define the intended urban design outcomes."	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.
3.5.4 Public realm	Add "is predominantly held in public ownership as a public asset"	There must be adequate provision for a substantial portion of the public realm to be publicly owned, not just publicly accessible.
3.5.5 Environment and sustainability	Revise "maximise the opportunity to retain existing mature trees, remnant vegetation, marine plants and habitat for fauna where possible"	
3.5.5 Environment and sustainability	Revise "incorporate landscaping with endemic a mix of species that is suitable to the conditions and promotes biodiversity, with a preference towards retaining existing vegetation where possible"	A broader palette will be required to achieve extensive podium planting, green walls and vertical gardens.
3.5.6	Revise	Stormwater may be managed in a variety of ways that

	Community	"managing stormwater regard to average recurrence	provide environmental, health, recreational, educational
	safety and development constraints	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 "	and amenity benefits.
Infrastructure Plan	Table 3 Infrastructure Plan	Comment	Table 3 does not provide new or adequate information: the details column includes items that are already listed elsewhere, and is not comprehensive.
	Table 3 Roads and intersections	Delete "Provide road and intersection upgrades as required by traffic studies undertaken by the applicant and approved by the MEDQ" Replace with "Undertake comprehensive traffic studies to analyse and understand the effects of proposed development on traffic congestion in the CBD and wider city."	The roads and intersections adjoining the site cannot be looked at in isolation.
	Table 3 Roads and intersections	Add "provide on-street bicycle infrastructure"	
	Table 3 Roads and intersections	Add "Upgrade to on-grade pedestrian links and crossovers impacted by the development. No overpasses or underpasses permissible as exclusive use spaces."	• The use of overpasses and underpasses for pedestrians should not be allowed as it precludes 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	Add "Retain and embellish the existing parks in the PDA to improve useability, with no loss of area."	 Embellishments to existing parks must be to enhance the parkland function. Embellishments and usage of existing parks must not diminish their useability for large public gatherings, including freedom-of-speech events and protests.
	Table 3 Public realm	Add "a Public Realm Master Plan and Design Guide"	
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Strategy	Introduction	"Delivering a world-class integrated resort development" Replace with "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"	
	5.1 Introduction	 Add "A separate, independent body will be established to oversee implementation of the strategy. Its responsibilities will include: Promoting, facilitating, carrying out and controlling the development, disposal and management of land and other property within the PDA; Achieving an appropriate balance between commercial and non-commercial functions; Ensuring development in the PDA complements, rather than duplicates, other development in the inner city Brisbane area; etc 	
	5.2 Delivering a world-class integrated resort development	Remove "Deliver a casino to attract significant visitation from the international gaming market, including VIP facilities."	Not appropriate in this location, nor required – refer comments on Section 3.1 Vision
	5.2 Delivering a world-class integrated resort development	Add 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."	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.

5.3 Delivering a high quality public realm	Add "Deliver a resilient and sustainable public realm."	 The project must encourage the investigation and application of sustainable design including, but not limited to, urban agriculture, green roofs, roofwater and stormwater capture and reuse, solar power and green infrastructure; 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.
5.3 Delivering a high quality public realm	Add "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	Add "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."	The project must deliver public benefits for residents and day-to-day users, not just resort guests.
5.3 Delivering a high quality public realm	Amend "Deliver interpretive signage through the QWB PDA that assists wayfinding. and highlights the indigenous and colonial heritage of the precinct including the Brisbane River."	
5.3 Delivering a high quality public realm	Add "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	Amend	How have the uses listed been shortlisted as the most
Conservation	"Provide for conservation and adaptive re-use of	suitable adaptive re-use of the existing heritage places?
and adaptive	existing heritage places within the QWB PDA including	
re-use of	activation with a range of uses including boutique	
heritage	retail, food and beverage outlets, offices or hotels	
buildings and	where deemed appropriate through consultation with	
places	expert heritage consultants and relevant statutory	
	bodies."	