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The Right Honourable Cr Adrian Schrinner  
Lord Mayor of Brisbane  
GPO Box 2287  
BRISBANE QLD 4001

Via email to: [lord.mayor@brisbane.qld.gov.au](mailto:lord.mayor@brisbane.qld.gov.au)

Dear Lord Mayor

**Brisbane CBD BUG submission on Howard Smith Wharves  
development application - A006618899**

This submission provides the views of the Brisbane Central Business District Bicycle User Group (CBD BUG) on the Howard Smith Wharves (HSW) development application (DA) (A006618899).

As a matter of policy, the comments in this submission are limited to issues impacting bicycle riders and other active travel users.

The application for another redevelopment of the HSW provides a welcome opportunity for a major improvement to this precinct. This improvement should be targeted at delivering the benefits to the public that were promised by the developer under the initial development arrangements. We note that the number of cyclists using the area has declined since the initial development, following a steady increase prior. It appears the developer has done their best to make people walking and cycling through the venue feel unwelcome.

Prior to the initial HSW precinct redevelopment BCC councillors made glowing statements predicting the benefits that would flow for the public. A prime example is "This is a once in a lifetime opportunity to reimagine one of the last remaining inner-city reaches of the Brisbane River, with dedicated rock climbing areas, cycling and pedestrian facilities linking to Riverwalk, as well as a new river's edge amphitheatre seating area," Cr Cooper said. "Around 80 per cent of the total site will be public parkland and open space and will be easily accessible from Riverwalk, or through two new cliff-face lifts at Bowen Terrace and Wilson's Outlook." (Source: <https://pco.asn.au/works-start-howard-smith-wharves-revitalisation/>).

The HSW developer also claimed the active transport corridor would feature a "dedicated cycle path" (refer Figure 1).

But these benefits (apart from the two cliff face lifts whose installation has been sub-optimal due to the queuing by waiting passengers obstructing shared path users) have simply not eventuated, particularly for people who need to walk or ride through the area.

The new DA is an opportunity to address the multitude of deficiencies and lost opportunities for active travel through this precinct.

However, the latest DA (A006618899) contains a range of objectionable elements with the key issues outlined below:

- In the document submitted by the developer titled *App G - Landscape Concept Plan* page 10 of this document indicates that almost the entire length of the public path through the development area is proposed to be a driveway used by trucks for loading/unloading and making “turnaround movements”. This approach would be a gross misuse of this path and pose a serious safety issue for path users - and must therefore be rejected by Council.
- This proposal in this DA for the new hotel to span the shared path (refer Figures 2 and 3) will impose even greater restrictions on the movement of active transport users travelling through this area via the public path. We call for this building’s envelope to be reduced so it has an appropriate set-back from the path – especially to remove the potential for people exiting doorways or stepping out from behind columns to be involved in crashes with people riding bicycles/scooters.
- The amount of space proposed in this new DA to be dedicated for driving and parking vehicles is largely unnecessary - given the site has very convenient access by public transport (especially ferry and bus) and by walking and cycling. This allocation of space for driving/parking motor vehicles needs to be substantially reduced to enable improved walking/cycling/scootering through the site for the public.

We note that the Traffic Impact Assessment submitted for DA A006618899 fails to include a patronage count of movements of people on foot or wheels (bicycle/scooter) along the existing active transport corridor detailing (refer Figures 4 and 5). This is unacceptable. Active transport like any other form of transport has engineering guidelines. Proper investigation needs to be conducted to ensure transport corridors are fit for purpose and meet relevant guidelines - in this case Transport and Main Roads (TMR) as well as AustRoads guidelines for the construction of active transport. To ensure the path design is within TMR and Austroads guidelines the CBD BUG performed its own path users count within the development on the primary active transport corridor (refer Table 1). In relation to this count the following points should be noted.

- There was heavy rain across Brisbane the morning of the day on which the count was conducted (10/10/24), which would most likely have reduced the volume of active transport users traveling home during that day’s afternoon/evening peak travel period.
- As per many evenings, an event was being held. Due to the nature of the HSW development (an event space) pedestrian movements for events must be factored into the paths design.

Based on the results of the CBD BUG’s shared path users count, patronage far exceeds the design parameters for a shared path (by 200%) as per TMR and AustRoads guidelines (refer Figure 6). It is unacceptable that the development should be permitted to yet again provide an active transport corridor that does not comply with the relevant guidelines.

To address the numerous defects in the current and proposed HSW development the following points detail the key elements required to rebalance the usage of this site for the benefit of the whole community.

1. Public access through the site to remain open 24/7 during demolition, construction and then on a continuous, ongoing basis for the replacement path, with all works via a minimum clear width of 5.0m for the temporary path at the current elevation.
2. Redevelopment to deliver a permanent, segregated path in accordance with Austroads and TMR guidelines - comprising a minimum 3.5m wide path for pedestrians and 4.0m wide path for bicycle /scooter riders. Surface treatment to clearly define segregated nature of path in accordance with similar paths in Brisbane.
3. Services e.g. waste bins and all vehicles to be prevented from using the paths and as a very minimum outside of peak commuter times i.e. 7-9am 3-7pm

4. For the service road through the site - to ensure this is a low speed environment it is clearly marked via signs and surface markings as a 15km/h shared zone, and coloured pavers are used for the surface treatment.
5. Queuing/waiting areas for users of cliffside lifts to not impede the users of these paths. An effective "lobby" like space to be provided away from the paths at each lift.
6. Access to/from the lower level of the "proposed additional lift west" not to obstruct or create conflict with path users travelling through the HSW precinct. This can be achieved via positioning this lift on the river side of the active transport corridor. It could be accessed from the top of the cliffs via a longer walkway spanning the active transport corridor and would then provide people wanting to visit the HSW riverfront buildings more direct access.
7. Redevelopment not to reduce the passive surveillance of the active transport corridor through the development to ensure gender equality and safety in urban design and through poor sightlines not lead to crashes between people walking and people riding. This is of particular concern as the primary active transport corridor is proposed to be positioned under a building. Further to this, the columns supporting the building will be large and likely increase the crash risk between different groups of path users.
8. No storage on the bikeway/ pedestrian path of goods being delivered or waste being removed.
9. No cleaning using machinery / pressure washers etc during the morning and evening peak travel periods that may impact path users.
10. No closures of the public areas without prior approval of BCC and prior notification to public open space and path users.

Yours faithfully

*Paul French*

Paul French  
Co-convenor  
Brisbane CBD BUG  
11 October 2024

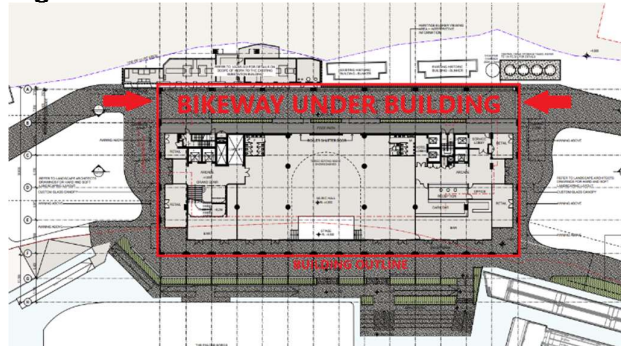
**Figure 1 - HSW 30 April 2018 X (formerly Twitter) post**



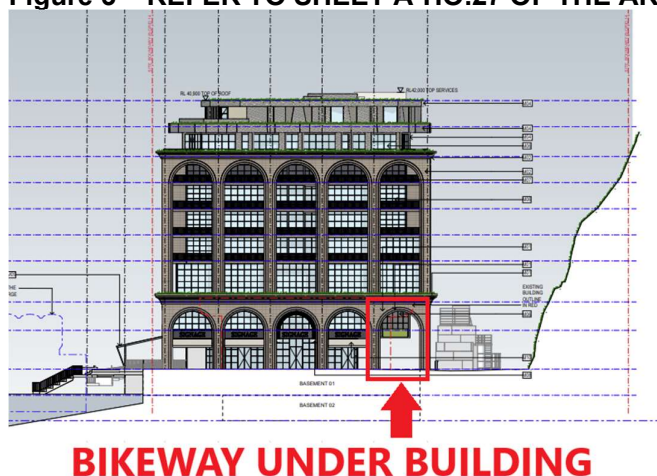
**Table 1 HSW shared path patronage count, 10 October 2024**

	Outbound		Inbound	
	Ped	Bike/Scooter	Ped	Bike/Scooter
5:30 – 6:00pm	280	17	117	13
6:00 – 6:30pm	142	12	115	10
Total	422	29	232	23
<b>Grand Total</b>	<b>Pedestrian – 654 , Bike/Scooter 52</b>			

**Figure 2 – REFER TO SHEET A-HO.016 OF THE ARCHITECTURAL DRAWING**



**Figure 3 – REFER TO SHEET A-HO.27 OF THE ARCHITECTURAL DRAWINGS**



**Figure 4 – Statement from Traffic Impact Assessment**

## 1.2 Service Vehicle Arrangements

Howard Smith Wharves currently implement a comprehensive service vehicle management plan which is based on minimising impacts on the pedestrian, **cycle** and traffic movements through the site during peak traffic periods.

The management plan will be further refined to accommodate the demands generated by the proposed facilities, in particular the bump in / bump out for events in the music hall and the modified refuse collection points within the precinct.

Furthermore, the additional lift capacity enhances the pedestrian connectivity between the site and Fortitude Valley.

**Figure 5 - statement from Traffic Impact Assessment**

## 3.5. Existing Travel Demands

The Boundary Street / Ivory Street signalised intersection forms the only point of vehicular access into the HSW car park and loading zones for passengers and service vehicles.

Due to the variety of facilities within the HSW precinct, which fluctuate in trading patterns on a daily basis, particularly the event spaces, it is difficult to accurately quantify the travel demands generated by the existing uses within HSW. Furthermore, there is also a significant proportion of pedestrian, **cycle** and scooter movements travelling through the precinct not associated with the facilities.

To gain some understanding of the travel mode proportions associated with the existing facilities, TTM conducted surveys of the traffic (vehicular) at the access to the precinct (roundabout on Boundary Street) and car park access. The results are presented in **Appendix B**.

The surveys were conducted over 3 days (Wednesday 30<sup>th</sup> November to Friday 2<sup>nd</sup> December, 2022) between the hours of 4pm to 7pm.

Key observations from the surveys are summarised as follows:

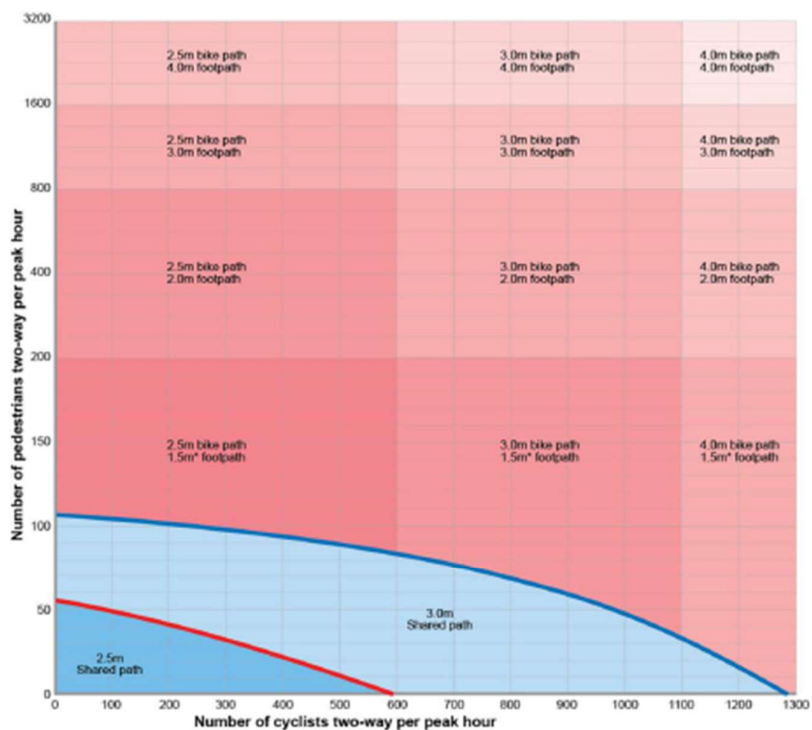
- The peak development traffic generation period on the Wednesday and Thursday did not coincide with the road traffic peak i.e. the peak demand generated by HSW occurred between approximately 6 – 7pm, whereas the road peak occurred between 4.45 – 5.45pm.
- The HSW peak traffic demand did coincide with the road traffic peak on the Friday, which is 4.45 – 5.45pm.
- During the road traffic peak on the Wednesday and Thursday, the development traffic generation was approximately 50 – 60% of the Friday peak generation.
- It is expected that this trend would be similar for Monday and Tuesday – which suggests that the peak traffic demands generated by HSW only effectively conflict with one peak traffic period across an entire week.

Based on the traffic surveys, the total traffic demands during the road traffic peaks via Boundary Street is summarised in Table 3.2.

## Figure 6 - Clip from TMR, Road Design Part 6A

Supplement to Austroads Guide to Road Design Part 6A: Pedestrian and Cyclist Paths

Figure 6A-2 Path capacity and recommended widths, directional split 75/25



Notes: This figure is not to be used for pedestrian only paths

1.5 m footpath width is the low use minimum only and is not appropriate at higher pedestrian volumes

A 75/25 directional split is typical for most commuter paths which are subject to high peak direction volumes.