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Dear Cross River Rail Development Authority,

Thank you for this opportunity to comment on the Roma Street CRR PDA Proposed Development Scheme.

Space for Cycling Brisbane is an association of the Bicycle User Groups of Brisbane. We therefore recommend the submissions from Brisbane CBD BUG and Brisbane North BUG which you would have already received.

Brisbane in 2021 is a city with a high reliance on private motor vehicle transport. Better connected infrastructure for walking, cycling and e-mobility will empower residents to switch a portion of car trips, reduce the load on the road network, and create a healthier, safer and more sustainable and connected community.

In this context, we support development on land along the rail line which is included in the Brisbane City Plan 2014 as "Principal Centre (City Centre)". We note that currently this space is mainly used for car-parking. We consider that residential and mixed-use development makes much more sense in this location right on the edge of the CBD and on top of a major public transport hub.

We note however, that the proposed development area also includes land which is currently used as Brisbane City Council's parkland operations centre—which we assume is important for keeping this small but lovely park in top condition. Presumably, if this space is developed, the parkland operations would need to relocate nearby. We do not support any net loss of publicly accessible green space. Hence it would not be a satisfactory solution if the parkland operations facilities and Brisbane City Council depot were required to be absorbed into land that is currently publicly available parkland. This must be considered in any development application.

Our major concern is for the future of the Normanby Bikeway, which is the major active transport connection from the Brisbane CBD to the northern and north-western suburbs.

This path—including the underpass beneath College Rd—cost approximately \$17 million in 2007. It supports around 1,200 cycle movements per day, and 450 pedestrians. These numbers can be expected to grow with the completion of further stages of the North Brisbane Bikeway (recently opened to Woolloowin, and planned to extend to Eagle Junction).

Under section 2.6.3 of the Proposed Development Scheme ("City centre transition precinct"):

*"Development within the city centre transition precinct ... protects and enhances the Normanby Bikeway link to Parkland Boulevard, establishing an adjacent pedestrian pathway to facilitate greater separation of pedestrian and cyclists within the PDA."*

We support the creation of an adjacent pedestrian pathway, to allow for safe separation between different travel modes; bikes, e-scooters and other micro-mobility devices on one hand, and people walking, running, etc on the other.

Unfortunately, recent experience warns us to be sceptical when reading the intent to "protect and enhance" the Normanby Bikeway. The masterplan for Howard Smith Wharves included reassuring words about access along the river connecting the New Farm Riverwalk to the CBD. But the reality on the ground is that the developer there has deliberately obstructed this critical active transport corridor, creating a situation that is dangerous and uncomfortable for people walking and cycling as well as patrons accessing the commercial premises.

Similarly, the vision for the Queens Wharf precinct required upgrades to the Bicentennial Bikeway, yet somehow a public plaza is to be imposed on one of Brisbane's oldest and most vital bike routes. In the middle of that cycling arterial route, used by thousands of cyclists per day, a "shared zone" will create conflicts between people walking and cycling, which will inevitably lead to ill-will and potentially to injuries.

We therefore propose that the requirement to preserve and enhance the Normanby Bikeway be strengthened, with an easement to protect the primacy of the through function. Any development access should not open directly onto this pathway without sufficient separation and sight lines. The pathway must not be obstructed in future with temporary events, outdoor drinking and dining, smoking areas, or any other "activation" of the surrounding space.

Any development of the site should also avoid closures of the Normanby Bikeway during construction. This corridor must be treated as a primary arterial transport route.

Section 2.6.3 of the Proposed Development Scheme ("City centre transition precinct") further requires

*"Development within the city centre transition precinct ... allows for a future connection from Roma Street Parkland to the Victoria Barracks that extends over Countess Street, busway and railway infrastructure."*

Rather than simply "allowing for a future connection", we suggest that any development of the City centre transition precinct must *include* a high quality pedestrian and cycle connection from Roma Street Parkland to the Victoria Barracks that extends over Countess Street, busway and railway infrastructure.

We have seen in the proposal for the Albion Exchange development, that "allowing for a future connection" has been interpreted to mean that Brisbane City Council must fund and construct cycling connections, rather than those being integrated in the commercial development.

Development of formerly public land must *include*, rather than simply “allow for”, provision of active transport infrastructure at public expense.

We also support the requirement that “development minimises vehicular crossovers to Parkland Boulevard”. But again, we feel this requirement should go further. Future development on this site must be centred around public and active transport. Private vehicle use should be actively discouraged, and the developments must ensure there is sufficient provision for loading bays, disabled parking, passenger drop-off/pick up, rubbish collection, service vehicles, etc. such that these do not impinge on active transport thoroughfares.

The Roma Street Priority Development Area should seek to minimise car ownership for residential developments to ensure that residents are not incentivised to drive for short trips instead of using the Roma Street bus/train stations, and walking or cycling.

We suggest that the development scheme remove car parking minimums for residential developments, set a very low minimum requirement for car parking spaces, or unbundle car parking space ownership from residential apartments. Residential bicycle parking minimums should be high: one secure bicycle space per bedroom. Spaces should be provided for “car share” to give residents the option of occasional car use without needing to own a car.

We support the objectives set out in section 4.2.9 Major transport connections:

*“Deliver a range of major transport connections, including as indicated on Map 3: Structural elements plan, which improve pedestrian and cyclist connectivity within the PDA, and resolve access arrangements for Parkland Boulevard / Parkland Crescent, that address accessibility requirements for development within the PDA and to better connect the PDA to surrounding key destinations including, Roma Street Parkland, Kurilpa Bridge, the Bicentennial Bikeway, Victoria Barracks, Spring Hill and King George Square.”*

We suggest that this be expanded to require connections for walking and cycling between the major precinct portals: College Rd underpass (Normanby Bikeway), Gregory Tce, Albert St, Roma St, George St, Tank St to Kurilpa Bridge, and west across to Petrie Tce and the Caxton St precinct.

It should be made explicit that these must be high-quality connections. For example they must not include obstructions requiring cyclists to dismount. They should include shade and lighting and security features that make them feel safe and comfortable for people to use at any time of day or night.

Alternative routes should be available and easily navigable when major events are held in the precinct. The Roma St Priority Development Area must not repeat the mistakes at Howard Smith Wharves where commercial interests have been permitted to take precedence over the safety and comfort of residents who need to transition through this important CBD gateway.

Section 3.3.3 (“Other Infrastructure”) mentions: a “*potential major active transport bridge from Roma Street to Roma Street Parkland that may be delivered as part of a potential major sport, recreation and entertainment facility or other development outcome*”.

We consider this requirement should be strengthened. An active transport bridge connecting Roma St, George St and Tank St to the Roma St Parklands—and seamlessly to the Normanby Bikeway—should be a *priority*, not a future possibility in the development of the area. It should be constructed before work starts on any major entertainment arena so as to help provide safe passage through the area while construction work is underway. This connection is needed regardless of the future of the site for an entertainment arena, and should not be contingent on that development.

Thank you for considering our input.

Regards,

*Belinda Ward*

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