

General comments

In general the report does not consider the cumulative impacts of restricted public access to areas. I.e. how the lease configuration impacts access and how the offset areas impact access.

Specific comments and reference to draft LMP

Page Number	Section reference	Comment
5	1.1 Executive Summary	Is this statement true sounds like pre emitting DNRME decision? <i>This DRAFT full land management plan has been prepared in line with the Land Act 1994 to guide Brisbane City Council, in its capacity as trustee, for the future development and use of Mount Coot-tha Forest and the ongoing maintenance and management of the trust land.</i>
5	1.1 Executive Summary	Why doesn't plan deal with other matter rather than just the Zipline is this the only scope. <i>The plan provides clear information to the Department of Natural Resources, Mines and Energy regarding the proposed development of the Mount Coot-tha Zipline and proposed trustee leasing associated with the zipline development.</i>
6	1.1 Executive Summary	Typo of department name or has there also been liaising with Department of Environment and Science? The Department of Natural Resources, Mines and <u>Environment</u> , should be energy
7	1.1 Executive Summary	This is opinion based and doesn't consider if the lease will result in access across the site being restricted (e.g.

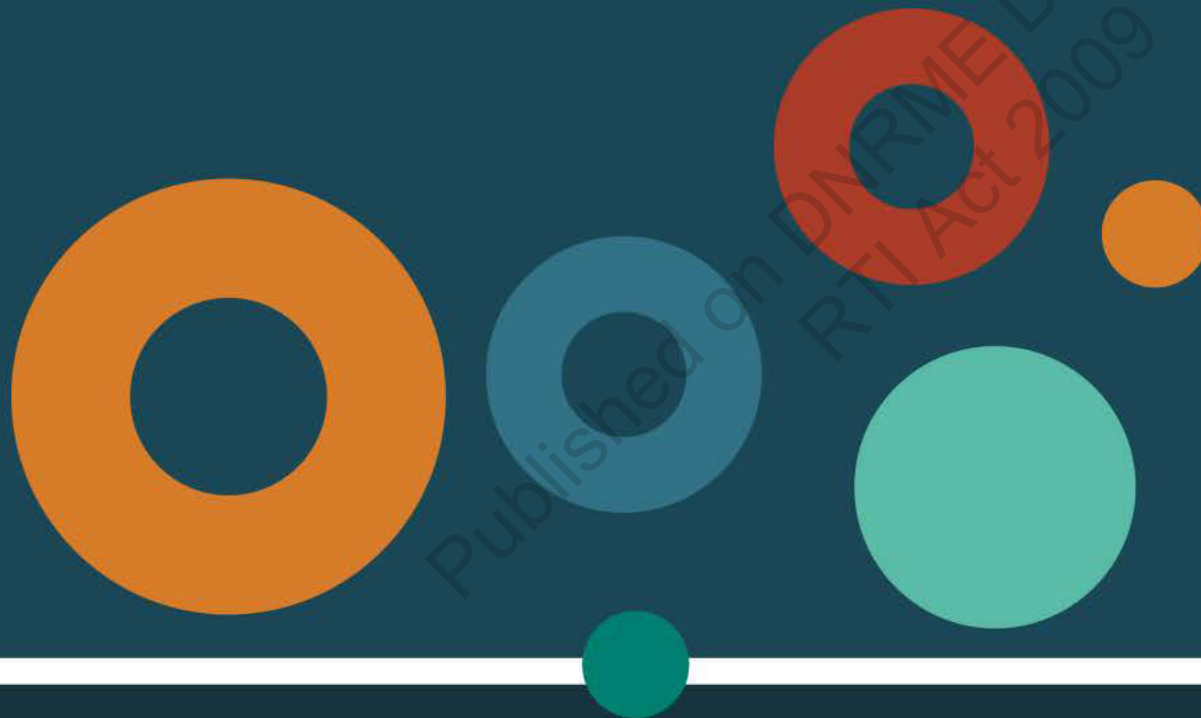
		lease layout and topography). <i>While the extent of commerciality and exclusivity to be introduced by the proposed development is modest lease area as a proportion of the total land area of the subject site</i>
7	1.1 Executive Summary	This comment conflicts with sentence 2 paragraph 2 of 1.1 Executive Summary. <i>Use the land management plan to guide the future development, use, maintenance and management of Mount Coot-tha Fore</i>
8	2.1 Purpose and Goals	This comment conflicts with sentence 2 paragraph 2 of 1.1 Executive Summary <i>The purpose of this DRAFT full land management plan (LMP) is to assist and guide Brisbane City Council in its capacity as trustee in the future development, use, maintenance and management of Mount Coot-tha Forest.</i>
9	3.1 Proposed Developments	If this is a 20 year plan (section 2.3) what other development is proposed.
17	4.3	Opinion based no relevance to management plan and the quarry was been approved Via a mining tenement before the DOGIT was setup. <i>Brisbane City Council has shared its opinion with the Department of Natural Resources, Mines and Energy that the proposed secondary use of the subject site for the development and operation of the Mount Coot-tha Zipline is appropriate and consistent with the Secondary Use of Trust Land Policy, especially considering that the Mount Coottha Forest currently supports the pre-existing, larger-scale use of the site for the Mount Coot-tha Quarry.</i>
18	4.5 Brisbane City Plan 2014	No consideration of the overlays in the LMP just stating what ones effect the property
19	4.6.3 Regional Ecosystems	This is opinion. <i>Most landholders have a colloquial name for vegetation on their property.</i>
22	Table 6 Historical Impact Assessment	Doesn't appear to include firebreaks or fire management lines
37	7.7.1	Will the public have access to this offset area. If not the area impacted for loss of public access will be larger than the development footprint. <i>A net gain for the environment with clearing to be offset within a 8.7Ha area within the Mt Coot-tha precinct.</i>
38	Scenic Amenity19	Will this be restricted access?

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41	7.7.2	What is this and/or how will it be gained? <i>To be effective, future development of the site will require a shared direction and collaborative approach</i>
42	8.2 Secondary Use	Why is BCC different to other areas? <i>Generally, secondary uses of trust land in Brisbane City should be allowed where they</i>
43	8.3.2	Where is the evidence? Not diminish the purpose of the trust land
44	8.3.3	This conflicts with 8.3.2 sentence paragraph 3. <i>Provide an essential community service that does not diminish the purpose and amenity of the trust land</i>
60	10.2.3	It is unclear what is meant by this statement. This statement should be clear if the operator is taking on all risk of loss of infrastructure due to what is considered 'risk appropriate'. <i>Residual (i.e. unmitigated) risks to the infrastructure elements of the proposed zipline facility have been accepted as a necessary commercial risk by the proposed operator</i>

Draft Mount Coot-tha Forest Land Management Plan

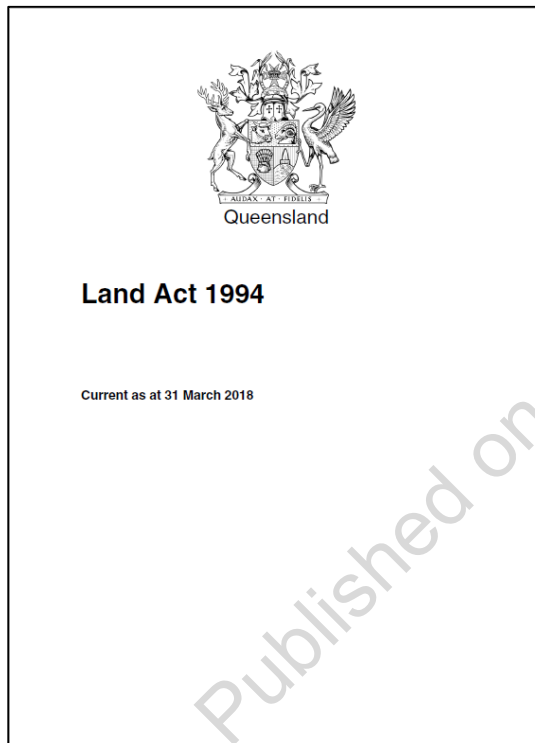
State Agency Briefing



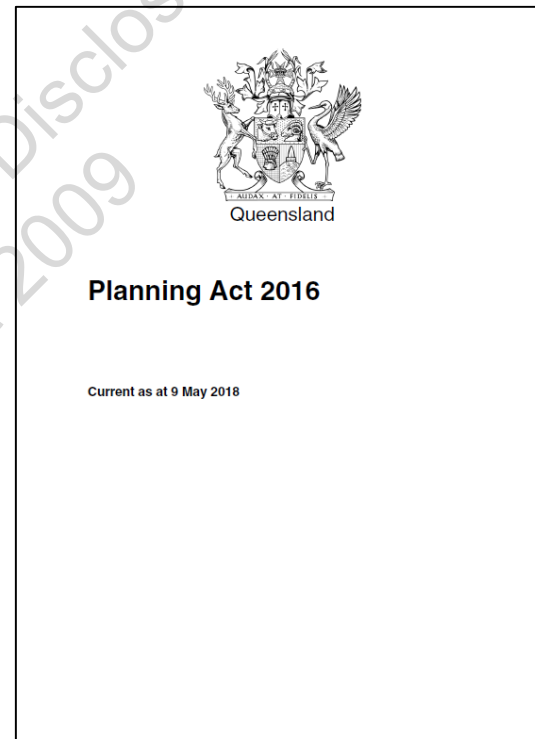
eleas

Current Processes

Land Management Plan Review



Development Assessment



Site Context - Lot 2 on SP241566

- Tenure: Deed of Grant in Trust - Public Park Purposes
- Trustee: Brisbane City Council



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Land Act 1994 Context

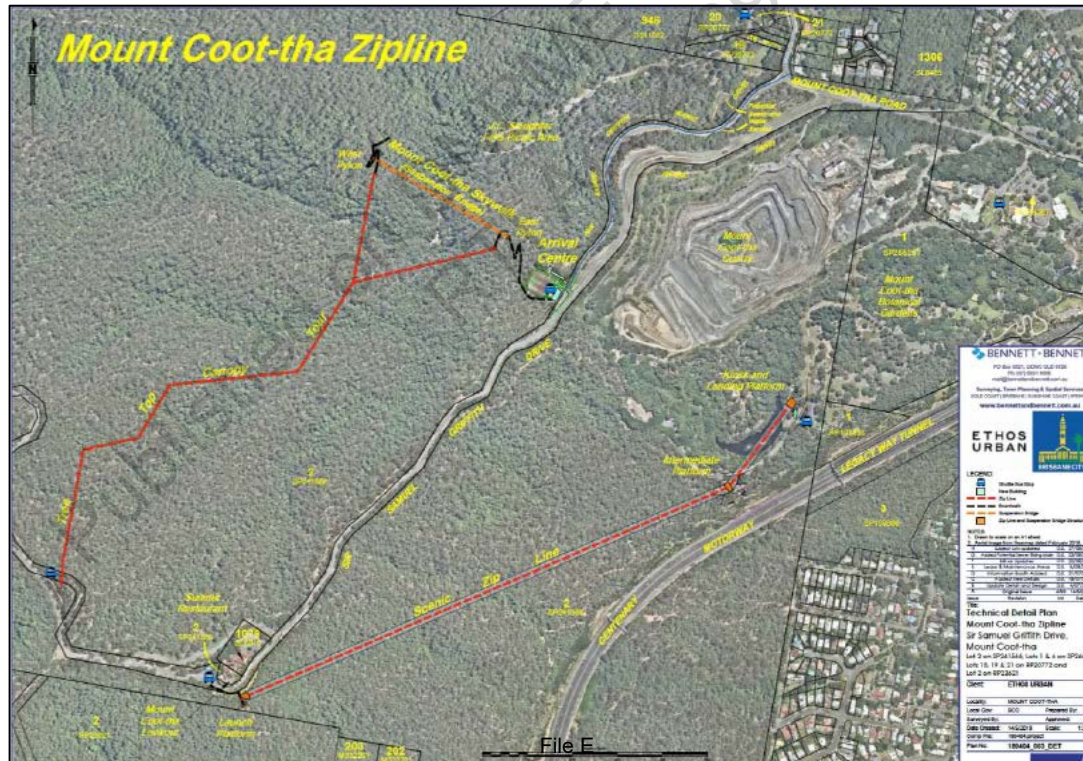
- Generally, the Trustee must undertake all action necessary for the maintenance and management of the trust land.
 - Actions must be consistent with the purpose for which the land was granted in trust; and
 - The *Land Act 1994*.
- However, the Minister may approve an inconsistent action provided the inconsistent action does not;
 - Diminish the purpose for which the land was granted in trust.
 - Adversely affect any business in the area surrounding the trust land.
- Council as Trustee have proposed a trustee lease to a relevant party over the area subject to the Zip line proposal.
- The Ministers 'in principle' approval is required prior to the Council approving a trustee lease under section 57.
- The department has considered the zip line proposal and requested Council to prepare a Land Management Plan to support the request for 'in principle' approval of a trustee lease.
 - Under section 48, If asked by the Minister, the Trustee must apply for the approval of a management plan for trust land.

Land Management Plans

- *Land Act 1994* – Objects
- *Land Act 1994* - section 52, Minister may approve action that is inconsistent (***inconsistent action***) with the purpose for which the land was granted in trust if the Minister is reasonably satisfied the inconsistent action will not;
 - Diminish the purpose for which the land was granted in trust.
 - Adversely affect any business in the area surrounding the trust land.
- Departmental Policy: Secondary Use of Trust Land, 5 criteria
 - Strategic Value
 - Consistency with primary use
 - Commerciality
 - Exclusivity
 - Incremental progression and forward planning
- Land Management Planning for Reserves or Deeds of Grant in trust - Information Kit

Zip line Proposal

- Current status – draft for review, prior to consultation.
- Components - skywalk, arrival centre, tree top canopy tour and scenic zip line.



Continued...



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Request for Agency views

- Separate to the Development Assessment requirements of various agencies, DNRME is seeking advice and information on the overarching state interests of relevant State agencies to assist the department in determining whether the proposed inconsistent secondary use of lot 2 diminishes the primary purpose of the DOGIT.
- In addition to the responses already provided does any agency wish to provide further information?

release



Date : 19/11/2018 3:28:51 PM
From : "MACCHERONI Annie"
To : "PETCHELL Blake" , "LEO Daniel"
Subject : FW: Mt Coot-tha Forest | Revised Draft LMP
Attachment : image005.png;image006.jpg;image007.png;image008.png;image009.png;image010.png;

Jacqui's comments for you,

Annie

From: DAVIES Jacqui
Sent: Monday, 5 November 2018 4:30 PM
To: MACCHERONI Annie
Subject: FW: Mt Coot-tha Forest | Revised Draft LMP



Jacqui Davies
A/Senior Land Officer
State Land Asset Management | South Region
Department of Natural Resources, Mines and Energy

P: 07 3330 4398
E: jacqui.davies@dnrme.qld.gov.au
A: L18, 275 George Street, Brisbane, QLD, 4000 | GPO Box 2771, Brisbane, QLD 4001
W: www.dnrme.qld.gov.au

From: DAVIES Jacqui
Sent: Tuesday, 23 October 2018 1:58 PM
To: TUK Daniel
Subject: FW: Mt Coot-tha Forest | Revised Draft LMP



Jacqui Davies
A/Senior Land Officer
State Land Asset Management | South Region
Department of Natural Resources, Mines and Energy

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From: DAVIES Jacqui
Sent: Thursday, 27 September 2018 9:21 AM
To: CROMBIE Elizabeth
Subject: RE: Mt Coot-tha Forest | Revised Draft LMP

Hi Liz

Please see below my dot points in relation to a preliminary review of the DRAFT LMP as requested by Sharron.

Good Morning,

Please see below dot points on the DRAFT Land Management Plan (LMP), please note that is a preliminary review:

- The DRAFT LMP was received yesterday (Wednesday 26th September 2018)
- Brisbane City Council describes Mt Coot-tha Zipline as a low-impact, environmentally-sensitive, world-class ecotourism experience, at Mt Coot-tha Forest.
- Total proposed trustee lease area measuring 15.6246ha being 5.9579ha on the ground and 9.6667ha above ground.
- 1.02% of the total area of the subject site.
- Outlines the proposed uses of the land –
 - Treetop Canopy Tour
 - Mount Coot-tha Scenic Zipline
 - Mount Coot-tha Skywalk: Suspension Bridge and Cultural Heritage Tour
 - Arrival Centre
- Outlines non-core Activities on the proposed site:
 - Food and Beverage sales at the Zipline Arrival Centre and Botanic Gardens Kiosk
 - Sales and promotion of experiences that complement and promote the area

- Shuttle bus transfers
- Provides estimated visitor numbers for Treetop Canopy Tour, Scenic Zipline and Skywalk and Cultural Heritage Tour
- Refers to all Legislative and policies used to create the LMP
- Refers to the Draft LMP being consistent and appropriate with the Secondary Use of Trust Land Policy
- Outlines Technical Studies completed
- Proposal on enhancing tourism in Queensland
- Refers to the Shaping SEQ2017 goals
- Lists some challenges of the proposed development and construction
- Provides a list of the restrictions to the public due to the proposed development – restricted areas
- Provides Commerciality provisions of the LMP and the proposed new trustee
- Consultation – the DRAFT Full Land Management Plan will be placed on public display and provides the activities that are proposed for the consultation process
- 4 week public consultation is referred to in the DRAFT LMP.

Thanks



Jacqui Davies
A/Senior Land Officer
State Land Asset Management | South Region
Department of Natural Resources, Mines and Energy

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From: BURLING Sharron
Sent: Wednesday, 26 September 2018 10:10 AM
To: DAVIES Jacqui
Cc: CROMBIE Elizabeth
Subject: FW: Mt Coot-tha Forest | Revised Draft LMP
Importance: High

Hello Jacqui

Ken has advised that it's likely the Min's office will ask for a few dot points on the draft LMP for the Zipline.

Can you have a cursory look through and provide me with the headlines in a few dot points and clearly stating the fact that the information is based on a **very preliminary** review!

Can I have those points by noon tomorrow please?

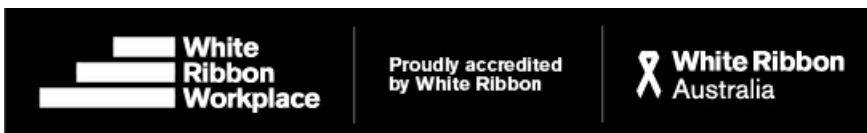
Many thanks

Sharron



Sharron Burling
A/Manager
State Land Asset Management | Southern Region
Department of Natural Resources, Mines and Energy
Mental Health First Aider/White Ribbon Ambassador/ Wellbeing Ambassador

P: 07 5626 6828 M: **Personal** ir
E: sharron.burling@dnrme.qld.gov.au
A: APVC Building, 14 Edgewater Court, Robina QLD 4226 | PO Box 4297, Robina Town Centre, Qld, 4230
W: www.dnrm.qld.gov.au



From: BURLING Sharron
Sent: Wednesday, 26 September 2018 8:10 AM
To: ATHERTON Maggie <Maggie.Atherton@dnrme.qld.gov.au>
Cc: DAVIES Jacqui <Jacqui.Davies@dnrme.qld.gov.au>; CROMBIE Elizabeth <Elizabeth.Crombie@dnrme.qld.gov.au>
Subject: FW: Mt Coot-tha Forest | Revised Draft LMP
Importance: High

Morning Maggie

I am so looking forward to seeing you on Friday!

sch4p4(6) Personal information

We have a planned a staged review of the attached draft LMP given the significance of the project (see attached email to Ken).

You are stage one! Please can you:

- conduct initial review of this document within the next 5 working days
- document your findings
- submit to Jacqui for stage 2

Any queries, please let me know.

See you soon!

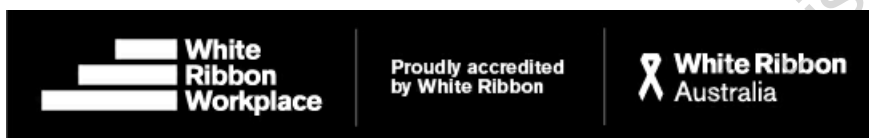
Cheers

Sharron



Sharron Burling
A/Manager
State Land Asset Management | Southern Region
Department of Natural Resources, Mines and Energy
Mental Health First Aider/White Ribbon Ambassador/Wellbeing Ambassador

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From: Helenah Mac [<mailto:Helenah.Mac@brisbane.qld.gov.au>]

Sent: Tuesday, 25 September 2018 4:58 PM

To: BURLING Sharron <Sharron.Burling@dnrm.qld.gov.au>

Cc: Wade Fitzgerald <Wade.Fitzgerald@brisbane.qld.gov.au>; sch4p4(6) Personal information@cprrgroup.com.au; sch4p4(6) Personal information@cprrgroup.com.au; Kate Weise <Kate.Weise@brisbane.qld.gov.au>; Tim Wright <Tim.Wright@brisbane.qld.gov.au>; sch4p4(6) Personal information@ethosurban.com

Subject: FW: Mt Coot-tha Forest | Revised Draft LMP

Importance: High

Good afternoon Sharron,

Further to my email to you of yesterday, we are pleased to attach the draft land management plan for Mt Coot-tha Forest for your Department's consideration.

The draft land management plan has been prepared by CPR Consultancy Group on behalf of Council in accordance with the State's LMP Guidelines/Information Kit and the Land Act.

Sharron, please feel free to let us know if you have any questions whatsoever!

Thank you again for your kind assistance in this matter.

Yours sincerely, Helenah

Helenah Mac

Senior Project & Portfolio Officer | Natural Environment, Water & Sustainability Branch |
City Planning & Sustainability Division | **BRISBANE CITY COUNCIL**

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RTI Act 2009

Date : 7/01/2019 1:45:26 PM
From : "LEO Daniel"
To : "TER BALS Wiebe"
Subject : FW: Zipline - LMP status
Attachment : image001.png;image002.jpg;
FYI

From: PETCHELL Blake
Sent: Monday, 7 January 2019 12:17 PM
To: BURLING Sharron; SHERWOOD Kenneth; SLAM - South Complex
Cc: CROSS Debbie; MONIN Bradley; FURNELL Teresa; LEO Daniel
Subject: RE: Zipline - LMP status

SB,

Actual decision – Helenah was going to contact BCC Development Services to get an idea (ill follow up).

Statutory timeframes under the *Planning Act 2016* – assuming no period is extended I have a due date of 1 March 2019 for the decision (10+35 bd starting from 19/12/2018)

- Public Notification stage - The Assessment Manager has 10 business days to consider properly made submissions received during the public notification period, starting the day after the Assessment Manager receives the notice of compliance (received by BCC on 18/12/2018).
 - By my count BCC has currently used 7 days of this period.
- Decision stage - 35 business days from the completion of the previous stages (referral, information request, public notification)
- The Assessment Manager can seek applicant agreement to extend both of the periods above.

Planning Act 2016 definition - business day does not include a day between 26 December of a year and 1 January of the next year.

Thanks,
Blake

From: BURLING Sharron
Sent: Monday, 7 January 2019 11:14 AM
To: PETCHELL Blake <Blake.Petchell@dnrme.qld.gov.au>; SHERWOOD Kenneth <Kenneth.Sherwood@dnrme.qld.gov.au>; SLAM - South Complex <SLAM-SouthComplex@dnrme.qld.gov.au>
Cc: CROSS Debbie <Debbie.Cross@dnrme.qld.gov.au>; MONIN Bradley <Bradley.Monin@dnrme.qld.gov.au>; FURNELL Teresa <Teresa.Furnell@dnrme.qld.gov.au>; LEO Daniel <Daniel.Leo@dnrme.qld.gov.au>
Subject: RE: Zipline - LMP status

Thanks BP

Do we have any idea of timing around DA decision?

Cheers

SB

From: PETCHELL Blake
Sent: Monday, 7 January 2019 10:54 AM
To: SHERWOOD Kenneth <Kenneth.Sherwood@dnrme.qld.gov.au>; SLAM - South Complex <SLAM-SouthComplex@dnrme.qld.gov.au>
Cc: CROSS Debbie <Debbie.Cross@dnrme.qld.gov.au>; MONIN Bradley <Bradley.Monin@dnrme.qld.gov.au>; FURNELL Teresa <Teresa.Furnell@dnrme.qld.gov.au>; LEO Daniel <Daniel.Leo@dnrme.qld.gov.au>
Subject: Zipline - LMP status

Hi All,

I spoke with Helenah Mac from BCC this morning regarding the status of the final LMP. She had only just p4(6) Personal inform and will be contacting a few people to firm up some of the items below.

- The LMP will not be finalised until a decision is made on the DA (to allow the inclusion of any conditional requirements of the DA into the LMP).
- DA – SARA has provided its concurrency agency response. The public notification period has finalised, the application is now with BCC Development services to make a decision on the application (I will keep an eye on this).
- LMP consultation finalised 31 December 2018.
- Likely lodgement of the final LMP with the department is end of January/ start of February (incorporating DA requirements & LMP consultation).

Next Steps

- Confirm the plan for the review of the final LMP – Blake to discuss with Sharron, then document
- Follow up with Meaghan on the IHL review of the LMP framework - Blake

Regards,



Blake Petchell

Senior Land Officer

State Land Asset Management | Land Services

Department of Natural Resources, Mines and Energy

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DNRME

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Date : 21/11/2018 9:12:19 PM

From : "MACCHERONI Annie"

To : "BURLING Sharron"

Cc : "PETCHELL Blake" , "TUK Daniel" , "CROSS Debbie" , "LEO Daniel"

Subject : Mt Coot-tha Zipline Dract Land Management Plan - Draft Response to BCC

Attachment : Letter to BCC - Zipline Draft LMP Response.docx; Attachment 1 Draft LMP Response.docx; image003.png;

Hi Sharron,

Attached is the proposed draft Response letter to BCC with attachment of specific areas of comment on the draft document as presented.

Blake and Dan have also prepared the following background points for use by yourself and IHL,

- BCC submitted its Draft Plan on 25 September 2018 (see attached). The Draft Plan has been prepared by the consultancy group CPR Group, on behalf of BCC, and forms part of BCC's application for an inconsistent secondary use of trust land.
- Mount Coot-tha Forest, Lot 2 on SP241566, is a Deed of Grant in Trust (DOGIT), which is dedicated for Public Park Purposes. BCC is the trustee of the DOGIT.
- A project working group (working group), led by Annie Maccheroni, has been established to coordinate the review of the Draft Plan, with a view to providing BCC with appropriate commentary to assist it through its land management planning processes.
- The working group has reviewed the Draft Plan, seeking expert advice from resources outside of SLAM where appropriate. A summary of the working groups activities through its review process is outlined below:
 - Development of supplementary guidance material for reviewers, which has been quality assured by Land and Native Title Services.
 - Formally inviting representatives from DNRME Planning Services, in-House Legal Services and Land and Native Title Services to participate as members of the working group.
 - 9 requests for agency views were sent to State Agencies with an interest in Mount Coot-tha Forest. All agencies have provided responses, with key points or issues being incorporated into the attached letter to BCC.
 - 4 independent reviewers assessed the Draft Plan using the DNRME's assessment framework.

The reviewer's findings, along with the views from the State agencies, are reflected in the attached letter to BCC. It is anticipated that the information provided in this letter will assist BCC in its land management planning processes and should be incorporated into its final land management plan, which will require the approval of the Minister (or delegate) along with its application for a trustee lease which is inconsistent with the reserve's purpose.

We are happy for you to adjust and forward direct to IHL as you see fit,

Thanks,

Annie, Blake and Dan



Annie Maccheroni
Principal Land Officer

State Land Asset Management | Land Services - South Region
Department of Natural Resources, Mines and Energy

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Helenah Mac
Senior Project & Portfolio Officer
Brisbane City Council
Level 8, 266 George Street
Brisbane Qld 4000

Dear Helenah,

Thank you for your email dated 25 September 2018 providing a Draft Land Management Plan for Mt Coot-tha Forest (Draft Plan) for consideration. In addition, thank you for meeting with Department of Natural Resources, Mines and Energy (the department) representatives on 20 November 2018 to provide a detailed briefing on community consultation activities proposed by Brisbane City Council (council) as part of developing the Draft Plan into its final format.

I note advice provided at the meeting of 20 November 2018 that council seeks the department's views on the Draft Plan as soon as possible to enable community consultation activities to commence as planned and running concurrently with public notification of the associated Development Application for the Zipline (A005011420).

I confirm the key considerations the department will take into account the department are the requirements of the *Land Act 1994* (the Act), as supported by the department's secondary use of Trust land policy (Policy) and the Information Kit for Land Management Planning for Reserves of Deeds of Grant in Trust (Information Kit).

Section 52 of the Act separates actions, leases or subleases on trust land into two categories, those consistent with the purpose for which the trust land was dedicated, and those determined to be inconsistent. Whether a proposal is consistent or inconsistent determines how that action, lease or sublease is assessed against the Act.

I confirm that on the basis a trustee lease associated with the proposed Zipline development on Lot 2 SP241566 has been determined as inconsistent with the sole designated use of the trust property for park purposes, the department's request for a full land management plan is to support its assessment of this proposed inconsistent secondary use. For such actions, leases or subleases, which are categorised as inconsistent, the Act only allows the Minister to approve such uses on trust land if satisfied the inconsistent action, lease or sublease does not:

- diminish the purpose for which the land was dedicated; and
- adversely impact any businesses in the surrounding area.

In addition, for actions, leases or subleases, which are categorised as inconsistent, the Minister is required to approve all further improvements built or placed by the lessee on the part of the trust land that is leased or subleased. Further, consistent with all decisions made under the Act, the decision-maker is required to consider the objects and principles of the Act in their decision-making.

The Policy and Information Kit identify five criteria clearly defining the circumstances in which secondary uses of trust land will ordinarily be considered.

These are:

- Strategic value - the proposed use is appropriate to the strategic value of the land's capabilities.
- Consistency with primary use - the proposed use is consistent with the designated purpose of the trust land and also facilitates or enhances, but does not diminish, the purpose of the trust land
- Commerciality - the strength of commercial motive behind the proposed use and whether it negatively effects the public interest.
- Exclusivity – degree of exclusion of use by the wider community.
- Incremental progression and forward planning - the contribution of the proposed use to any incremental chain of events that could lead to a final outcome quite different from that initially intended.

In addition to the above five criteria, community consultation and engagement is considered a critical step of land management planning for trust property. The final land management plan should present comprehensive results of community consultation activities. This should include identification of both positive and negative comments and matters received during community consultation and the identification of how adverse views received may be resolved or mitigated.

It is important for the final land management plan to explain how results of Council's community consultation process has influenced the overall proposal to address the issue of how the proposed use impacts both the continued use of the trust property for its public purpose and any expected impact of the proposal on other businesses surrounding the reserve.

From the department's review of the Draft Plan against the provisions of the secondary use framework identified above, I would like to draw your attention to the points raised in **Attachment 1**, for Council's further consideration when drafting the Plan into its final format.

I trust the information contained in this letter and the attached comments provided is useful.

Once the department has received and considered Council's final Land Management Plan - including the results of community consultation activities as indicated - it will then be in a position to determine and advise on whether:

- the proposed inconsistent secondary use of the Mt Coot-tha trust property presented by Development Application A005011420 is considered appropriate; and
- a trustee lease can be issued.

Should you have any further enquiries, please contact Sharron Burling, A/Manager, State Land Asset Management, South Region of the department on telephone 5626 6828.

Yours sincerely

Wally Kearnan
Executive Director

Attachment 1 – Summary of Comments

COMPLETE ENDORSEMENT BLOCK

Print only if required by next signatory

CTS [CTS No.]

Prepared by: Title: Division/Region: Telephone: Date Prepared:	Endorsed by: Title: Division/Region: Telephone: Date Endorsed:	Endorsed by: Title: Division/Region: Telephone: Date Endorsed:	Endorsed by: Title: Division/Region: Telephone: Date Endorsed:
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Attachment 1 – Summary of Comments

No.	Comments
1.	Strategic Value; Does the dedicated purpose reflect the community's expectations for the contemporary use of the land? Does the land management plan clearly demonstrate the trust purpose is consistent with the strategic value of the site and its primary use by reserve users?
2.	Consistency with primary use; Does the land management plan contain specific information to support how the proposed secondary use/s do not diminish the purpose of the trust land?
3.	Commerciality; The land management plan should clearly outline the impacts to reserve users and other businesses surrounding the reserve. The land management plan must clearly demonstrate the commercial arrangements with the trustee lease, how any additional revenue generated by the proposed trustee lease arrangement will be invested into the reserve for the benefit of the community, and whether any other businesses surrounding the reserve are impacted by the proposed use. Noting this may include businesses such as commercial tour operators who are not located directly surrounding the reserve, but use the reserve for other purposes. The land management plan should identify that the proposed use is not a standalone commercial enterprise, whose customer base is not reserve users, while also identifying how the proposed use will be directed at reserve users, and not impair or reduce the ability of the trust land to fulfil the current purpose it is serving for the enjoyment of the community.
4	Exclusivity; The land management plan must clearly demonstrate what is the extent of any exclusive use required for the proposed use that will result in restriction of access for the general public to the trust land and how will the trustee manage the impacts to any such loss of free access.
5	Incremental progression and forward planning; The land management plan should state whether the proposed use is the final iteration of a development, and if not then what subsequent stages or intensification of this or other uses is expected into the future.
6.	Consultation; The final land management plan should include a comprehensive summary of all community consultation undertaken and include details of any consultation undertaken prior to the development of the draft Plan- refer detailed explanation in accompanying correspondence.
General Comments	
7.	The Draft Plan and actions within it should relate to Lot 2 SP241566 in its entirety and not only portions of the lot affected by the immediate proposal.

8.	All incorrect references throughout the Draft Plan should be corrected, eg, Department of Natural Resources, Mines and Environment.
9.	The final land management plan should not contain any instances of opinion expressed within concluding statements. Such opinions should be omitted if not capable of being substituted with available facts.
10.	The final land management plan should only present the final proposed development of lot 2 SP241566.
11.	The legislation and policy section of the final land management plan should include analysis of the proposal's suitability against each of the relevant instruments, including the Brisbane City Plan 2014.
12.	The final land management plan should provide further information on the proposed approaches and strategies to address the challenges with section 7.7.2.
13.	The final land management plan should provide further information on the cumulative impacts of restricted public access to areas which the proposed development will cause, and how the lease configuration impacts access to those areas. Any mitigation strategies or actions to be taken should be fully explained.
14.	Provide further details within the final land management plan of the vegetation offset plan if certain offset measures are proposed to be located on Lot 2 SP241566.
15.	Clarify the impact of introducing the additional uses on the use of all existing infrastructure i.e. walking trails.
16.	Provide further information on the whether the measures to manage and mitigate the risk of bushfire are wholly contained with the proposed trustee lease area.