### **BACKGROUND**

The Queen's Wharf precinct has been identified by the Queensland government as a "Priority Development Area" [PDA] — this means it has been identified for accelerated development, with a focus on economic growth. The proposed Queen's Wharf PDA was declared on November 28, 2014, and went to public notification in 2015. There were 34 submissions received during this time (including one from the National Trust of Australia Queensland), voicing both concern and support. The government approved the PDA on 28 January 2016.

Extending from the current Treasury Casino building at the top of the Queen Street Mall to Alice Street, and from the Brisbane River's edge to George Street, the precinct covers more than 26 hectares across land and water – it will one of Brisbane's largest developments and it contains some of Brisbane's oldest surviving buildings in a unique former government complex.

The project's proponents have prepared a Plan of Development in order to seek Development Approval for this project. The Plan of Development includes extensive associated documentation and details how the precinct's cultural and built heritage will be retained and re-used as part of the development.

The NTAQ has reviewed the extensive project documentation and made a submission on the proposed development. This Positon Paper summaries the NTAQ's submission.

# NATIONAL TRUST OF AUSTRALIA (QLD) POSITION

The NTAQ understand that heritage is one of the many aspects being balanced by the project's proponents in their design of the new precinct. We are also cognisant of the strategic, economic and social justifications for the project. Nonetheless, and despite the areas of the project that we feel will have positive outcomes, the NTAQ does have several areas of concern.

### Areas of support

- NTAQ commends Destination Brisbane Consortium and the Star Entertainment Group (the proponents) for their continued commitment to the retention of all historic buildings within the PDA that are listed on the Queensland Heritage Register;
- NTAQ supports the proponent's plan to adaptively re-use the heritage buildings and provide greater public access to the buildings;
- NTAQ believes that re-activating the relationship between the historic buildings in the former Government precinct and the Brisbane River waterfront, an important relationship that was previously lost with the Riverside Expressway construction, is a positive outcome for the project; and
- NTAQ is pleased that the heritage and archaeological aspects were considered an important aspect of the suite of development documents.

### Areas of concern

The following is a brief overview of the NTAQ concerns – our full submission includes a detailed discussion of these issues and recommendations for each issue.

#### • Issues from 2015 Submission

The NTAQ does not feel that the issues we raised in 2015 have been adequately addressed in the 2017 PDA documents. Specifically, our recommendations regarding the establishment of an expert advisory committee to review proposals for the alteration and adaptation of the heritage places; and our recommendation that there be detailed analysis of each building's fabric, especially the interiors, be undertaken to guide a robust consideration of future re-uses.

#### • William Street Build Over

The William Street build over will effectively cut William Street into two separate parts and will adversely impact Brisbane's historic city grid pattern and its significance. The NTAQ feels strongly that the significant viewline from the northern to the southern end of William Street has not been adequately addressed and that the build over for William Street does not sufficiently respond to its significance.

#### Queens Gardens

The NTAQ believes that the creation of a large atrium style opening within Queens Gardens to allow views and access into the proposed below-ground retail spaces will adversely impact the historic form of the garden, the relationship between its landscape elements and the overall form of the park. The introduction of an opening such as this does not respect or respond to the significance of the Gardens or their level of intactness.

The PDA design includes a proposed shared zone (for pedestrians, cyclists & vehicles), which would cross the Gardens from east to west directly in front of the former Land Administration Building (now the Treasury Hotel). The proposed shared access roadway would impact on the Garden's intact layout and would substantially reduce the significant relationship between park and the former Land Administration Building.

#### Building Setbacks

The setting of a heritage place can contribute, negatively or positively, to the place's heritage significance. The proposed new building on William Street (adjacent to the former Department of Industries building) and the new residential towers on George Street (behind The Mansions and Harris Terrace) are not adequate and the NTAQ feels that they will adversely impact on the setting of these historic buildings and their significance.

#### • Inadequate Identification of Significant Views

Throughout the entire suite of documents, key significant viewlines are not adequately identified, including views to and from heritage buildings and views along significant streets. This leads to inadequate consideration and retention of important viewlines in the overall scheme, the design criteria and the technical criteria for the project.

#### Conservation Management Plans – overview

As stated in our 2015 submission, it is of extreme importance to the NTAQ that this project achieves robust and effective conservation planning documentation. In their current form, the CMPs are not robust and will not be effective management documents.

In particular, the understanding of each place's significance; detailed fabric analysis; guidelines for future uses deemed appropriate in the Plan of Development; restoration, repair and maintenance schedules; and implementation plans are needed.

### • Heritage Interpretation

With the Queen's Wharf development there exists the opportunity to introduce landmark heritage interpretation; however, the guiding document for interpreting the cultural heritage significance exhibits little innovative or creativity in its approach and does not provide enough detail. Heritage interpretation provides an opportunity to showcase the values of each building and tell the story of the precinct.

## • Best practice heritage management

As would be expected for such important sites, each of the reports states that it has been prepared in accordance with the Burra Charter principles. However, on review of each of the documents, the NTAQ believes that many aspects of the design and the approach are at times *not* consistent with best practice principles and thus do not represent an appropriate consideration of heritage significance.

In addition, the Conservation Management Plans do not provide any methodology for resolving apparent conflicts and compromises between the conservation of significant fabric according to Burra Charter principles and the requirements of future adaptive reuses.

### Approved Development and Compliance Assessment

With regard to development that will be subject to later compliance assessment, the current suite of documents do not provide enough detail for the approval at this stage. In this case, the NTAQ strongly recommends that the public be given the opportunity to comment on the detail of the later design and construction project phases. We also recommend that our recommendation from our 2015 submission, regarding the formation of an independent heritage review committee, be implemented for the compliance assessment phases.

#### SUMMARY OF RECOMMENDATIONS

- NTAQ suggest the establishment of an expert advisory committee to review proposals for the alteration and adaptation of the heritage places in the precinct.
- NTAQ strongly recommend that the PDA proponents reconsider the design of the William Street build over.
- NTAQ strongly support changes to the design for Queen's Gardens, including removing the proposed retail access atrium and reconsideration of the shared zone.
- The NTAQ does not feel that the existing setbacks are adequate and feels that they will
  adversely impact on the setting of these historic buildings and their significance. We
  recommend that larger setbacks are considered, to protect these buildings and their
  relationship to one another.

- NTAQ recommends that the proponent undertakes an analysis of important viewlines, as
  they relate to each place's heritage value and to the value of the overall precinct, and then
  reviews the overall design, building setbacks and criteria in light of this analysis.
- NTAQ requires more detailed and robust Conservation Management Plans for the precinct's heritage buildings. We recommend reviewing the CMPs and including detailed fabric analysis; guidelines for future uses deemed appropriate in the Plan of Development; restoration, repair and maintenance schedules; and implementation plans.
- NTAQ recommends that the proponents engage interpretation specialists to prepare a detailed Interpretation Plan to make the most of showcase opportunity.
- NTAQ believes that the Archaeological Management Plan requires a more detailed and robust Research Design that can properly guide the various types of future archaeological work that may occur.
- NTAQ recommends the preparation of a "Heritage Handbook" for each heritage listed place in the precinct, which brings together **all** the relevant information contained in the various reports for that one specific building including general heritage guidelines and site specific guidelines. This can then become the "go-to" document for designers, contractors and staff.
- NTAQ recommends a complete review of the documents to ensure that design criteria, recommendations, future uses and policies are consistent across the suite of documents.
- NTAQ strongly recommends that the public be given the opportunity to comment on the detail of the later design and construction project phases (the Compliance Assessment phases).

### ACTION TO PROMOTE THE TRUST'S POSITION

The NTAQ will promote its views on this issue:

- To our 12,000 members;
- To the media;
- To the project proponents; and
- To the QLD government.

For enquiries regarding this position paper, please contact our CEO Jonathon Fisher on:

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