

PDA SUBMISSION:
Queen's Wharf, Brisbane
(DEV2017/846)

Date::	17 October 2017
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NATIONAL TRUST OF AUSTRALIA
QUEENSLAND



EDQ Development Assessment Team
Department of Infrastructure, Local Government and Planning
1 William Street
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To whom it may concern,

Re: Queen's Wharf, Brisbane (DEV2017/846)

Thank you for the opportunity to provide this submission on the proposed Queen's Wharf Priority Development Area (PDA). The National Trust of Australia (QLD) [NTAQ] is Queensland's leading community heritage organisation. We aim to protect, conserve and celebrate Queensland's natural, built and cultural heritage. With \$54M of heritage assets, nearly 12,000 members and 800 volunteers across Queensland, and over 542,000 visitors to its properties, NTAQ makes a unique contribution to the state's heritage resources.

OVERVIEW OF THIS NTAQ SUBMISSION

The PDA documents present an extremely large and complex body of work. Many of the documents focus on the management of heritage items and many contain references to heritage, such as reports relating to urban design. Due to time and resource constraints, NTAQ has focused our review on the following documents:

- Volume 1: Planning and Design Report;
- Volume 2: Plan of Development;
- Volume 3 - Attachment C: Cultural Heritage Assessment Report;
- Volume 3 - Attachment D: Conservation Management Plans (10 separate reports);
- Volume 3 - Attachment E: Archaeological Management Plan; and
- Volume 3 - Attachment W: Interpretation Strategy.

This submission outlines the areas of the project that NTAQ supports and the areas of concern. It also includes general recommendations to address these concerns.

AREAS OF SUPPORT

- NTAQ commends Destination Brisbane Consortium and the Starr 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 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.

Issues from 2015 Submission

The NTAQ provided a submission on the 2015 Queen's Wharf PDA Design Scheme. At that time, NTAQ raised concerns regarding the impact that new uses could have on the heritage buildings within the precinct, especially where the interiors of these buildings are significant.

Further, NTAQ strongly supported a systematic, robust, and detailed conservation planning process of assessing the significance of all of the building fabric of these places, particularly the interiors, understanding that some of these interiors are very important and others have been changed substantially and can therefore be carefully altered again without detrimental impact.

NTAQ also suggested the establishment of an expert advisory committee, which would include representatives of the Department of Environment and Heritage Protection (EHP), to review proposals for the alteration and adaptation of the heritage places.

The NTAQ does not feel that the issues we raised in 2015 have been adequately addressed in the 2017 PDA documents.

William Street Build Over

The city's historic grid pattern placed the main emphasis on the north-south roads (including William Street) and dates back to the establishment of Brisbane. The alignment of William Street can be clearly distinguished in early photos of the city. 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.

Historically, there has always been a visual relationship between each of the former Government buildings on William Street, from the former State Library to Old Government House. Additionally, the clear viewline along this street, from the southern to the northern end, is a highly significant viewline in the precinct. NTAQ feels strongly that this viewline has not been adequately addressed and that the PDA build over for William Street does not sufficiently respond to its significance.

We strongly recommend that the PDA proponents reconsider the design of the William Street build over. We note that the PDA criteria required a minimum 12m height clearance for the build over, a height that is more likely to ensure that the build over does not block significant viewlines and is less likely to visually 'cut' the street into two halves. Although we understand that the proponents are attempting to balance a myriad requirements and design needs which has resulted in the pedestrian



bridge underneath the build over being lowered to 6m, we strongly feel that this design outcome will have an adverse impact on the heritage significance of the precinct, that it does not reflect the principles of the Burra Charter and it should be reconsidered.

Queens Gardens

The Queensland Heritage Register citation for Queens Gardens states:

"The present garden layout is important in demonstrating the principal characteristics of the work of influential landscape architect Harry Oakman, and is **one of the most intact** of his works surviving in Brisbane." (emphasis added)

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. We acknowledge that adequate access to retail spaces is a vital component of their long-term commercial success, however, introducing a 500m wide opening in the park is **not** an outcome consistent with the garden's significance or with the principles outlined PDA's Cultural Heritage Analysis Report.

The NTAQ met with representatives of the Starr Entertainment Group prior to making our submission. At this meeting the Starr representatives indicated that the proposed retail space under Queens Gardens may be moved to the main commercial buildings on William Street. The NTAQ strongly supports this and recommends that the Starr Entertainment Group changes the designs to reflect this move.

The PDA design includes a proposed shared zone (for pedestrians, cyclists & vehicles), which would cross the park 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.

However, we note that the latest PDA designs have reduced the scope of this road from two lanes to one. In addition, at the pre-submission meeting Starr Entertainment Group representatives stated that the shared zone will be restricted to hotel drop-offs and pickups only. Additionally, the NTAQ understands that new uses for historic buildings bring new design requirements to make the buildings viable commercial options. Given this, we support the inclusion of a shared zone with the following provisions:

- The shared zone is a one-way, single lane access;
- The shared zone is strictly limited to emergency vehicle access and hotel drop offs and pickups, and does not extend to hotel deliveries and cannot be used as a public access road between George Street and William Street;



- All monuments and plaques are retained in situ and are protected adequately. This particularly includes the marble plaque locating the site of the altar of St John's pro-Cathedral; and
- The paved surface of the existing area is retained or any new surfaces have a paved style, to retain the existing appearance of the Gardens.

Building Setbacks - Harris Terrace, The Mansions & the Department of Primary Industries Building (former)

We note that the design principles in the PDA documents seek to respect the settings of the heritage buildings in the precinct. Indeed, they clearly and consistently reiterate the importance of adequate setbacks of new buildings adjacent to heritage places, in order to maintain each buildings heritage significance. For example, the PDA's Cultural Heritage Analysis Report (p.69) states:

"The development of new, modern buildings adjacent to and/or in close proximity to heritage buildings must be carefully managed to avoid adverse impacts on the settings of these heritage places. If new development is located too close to heritage buildings, this can compromise...the settings of these places and impact on their cultural significance."

The setting of a heritage place can contribute, negatively or positively, to the place's heritage significance. In our dense urban areas, this ultimately means that the protection and enhancement of setting is intimately linked to urban design considerations. 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) do not adequately address this issue.

The NTAQ does not feel that the existing setbacks as illustrated in the PDA documents 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.

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.

We recommend 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.



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.

Queen's Wharf contains some of the earliest surviving buildings in Brisbane. The NTAQ believes that the CMPs for such important buildings should be exemplar examples and should be robust enough to guide important design decisions, to assess re-use options and to set out detailed restoration and conservation schedules of work.

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.

We are very willing to assist in the refinement of the CMPs and are available at your convenience for further consultation.

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.

Effective heritage interpretation should not occur in an ad hoc manner or be considered piece by piece – rather, detailed and holistic Interpretation Plans that integrate wayfinding, landscaping, lighting, street furniture, street art etc will prove to be more effective on a precinct scale.

Heritage interpretation provides an opportunity to showcase the values of each building and tell the story of the precinct. The NTAQ recommends that the proponents engage interpretation specialists to prepare a detailed Interpretation Plan to make the most of this opportunity. We would be extremely happy to work with the proponents and the consultants on this opportunity.

Archaeological Management

The NTAQ is relieved that adequate attention is given to potential archaeological resources within the precinct. However, we feel that the report requires further detail in order to adequately guide future archaeological work.

Specifically, we note that the research design contained in Section 8 of the Archaeological Management Plan should contain more than 'research questions'. Archaeological research designs are intended to set out the development of the approach, excavation methodology and artefact analysis curation for each type of work.



We recommend that a detailed research design is prepared for each type of archaeological work, including: archaeological monitoring; test pits; open area excavation; and salvage excavation.

Structure of reports and information

Information on heritage is captured across a huge suite of reports with the PDA documents. This makes analysis of the heritage issues for each site extremely difficult.

The NTAQ anticipates that this could cause issues at the detailed design, construction and re-use stages, with important heritage issues being “lost” in accompanying documents. For the successful implementation of each report’s findings, it is essential that heritage reports be easily usable documents.

We would recommend 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. The NTAQ is pleased that Starr Entertainment Group supported this approach when we presented it at a pre-submission meeting.

Document Inconsistencies

Across the large suite of PDA reports, there are often inconsistencies in criteria, approach and recommendations.

For example, Appendix G of the Planning and Design Report states in Section 9.1:

‘As part of the adaptive reuse of buildings, changes may be proposed that **could result in loss of original and significant fabric.**’ (our emphasis).

Conversely, every Conservation Management Plan contains a policy which states:

‘Fabric identified as being of high significance **should be retained and conserved**, with minimal changes to these elements.’ (our emphasis)

These inconsistencies make an overall review of the PDA documents extremely difficult and indicate that the various report authors are approaching heritage from different angles, which is not a desirable outcome.

We recommend a complete review of the documents to ensure that design criteria, recommendations, future uses and policies are consistent across the suite of documents.



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.¹ 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.

We recommend that the documents be reviewed and amended to ensure that the Burra Charter principles are being applied, and if not, to provide guidelines on how conflicting heritage issues will be managed during the design, construction and re-use phases.

Approved Development and Compliance Assessment

We note that the PDA documents recognise two separate approvals:

1. Development which can be approved from this suite of documents, subject to conditions; and
2. Development which will be subject to later compliance assessment.

With regard to the first type of development (approved with conditions); the NTAQ feels that it is vital that the detail, consistency and principles in the current PDA documents are adequate enough for this approval to be given, hence our detailed submission in regard to this suite of documents.

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.

¹ The ICOMOS Australia Burra Charter is the best practice heritage management guideline that sets the standard for heritage work in Australia.



If you have any questions regarding our submission or if you would like to meet to discuss our review, please contact our CEO Jonathon Fisher on 07 3223 6666.

Yours sincerely,

Jonathon Fisher
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