



BACKGROUND

Queens Wharf, currently Brisbane's largest development, was approved on 21 December 2017 by the Department of State Development, Manufacturing, Infrastructure and Planning (DSDMIP).

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 is one of Brisbane's largest developments and it contains some of Brisbane's oldest surviving buildings in a unique former government complex.

The \$3billion development involves the adaptive reuse of 11 historic places which are listed on the Queensland Heritage Register. This huge re-development will occur over the next six years and will turn Queens Wharf from a Government precinct into a tourist and entertainment precinct.

The National Trust of Australia (Queensland) [the Trust] made a detailed submission on the development documents. Our advocacy team undertook the task, wading through more than 17 reports to provide DSDMIP with our expert opinion on the proposed development's response to the heritage significance of the precinct and the individual historic places within it.

On their approval of the development proposal, the Department of Infrastructure, Local Government and Planning (DILGP) issued a number of development conditions that must be complied with – based on their own analysis of the development documents, expert reports and public submissions, such as that of the National Trust.

The NTAQ has analysed the development conditions issued by DSDMIP against the observations and recommendations made by the Trust in our submission. This is followed by a brief outline of other issues of note in the Development Conditions.

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.



Analysis of NTAQ 2017: Submission recommendations against Development Conditions

NTAQ 2017 Submission Aspects of Support		
ISSUE	DA RESPONSE	FURTHER RECOMMENDATIONS/ACTIONS
Unflinching approach of retaining all heritage listed buildings	All heritage listed buildings will be retained, conserved and adaptively re-used.	N/A
Commitment to adaptively re-use the heritage buildings and provide greater access into the buildings	All heritage listed buildings will be retained, conserved and adaptively re-used.	N/A
Re-activating the relationship between the government precinct and the Brisbane River waterfront, an important relationship that was previously lost with the Riverside Expressway construction	This relationship will be reactivated	N/A
Ensuring heritage and archaeological aspects were considered an important aspect of the suite of development documents	The NTAQ commends the DSDMIP for including extremely thorough provisions relating to historical archaeological management of the development as part of the DA conditions.	Recommend public open days of any archaeological investigations as a method of stakeholder engagement and promotion of Brisbane's heritage.

NTAQ 2017 Submission Aspects of Major Concerns		
ISSUE & NTAQ STANCE	DA RESPONSE	FURTHER RECOMMENDATIONS/ACTIONS
William Street build over The build over will effectively cut the street into two parts and will adversely impact the historic	Regrettably, the DA conditions did not address the concerns regarding the William Street build over and no changes to the	We still strongly recommend that the developments proponents reconsider



<p>city grid pattern, the relationship between the civic buildings along this street from State Library to Government House and significant view lines along this street.</p> <p>We strongly recommend that the developments proponents reconsider the design and raise the pedestrian platform from 6m to 12m (which was the recommended height clearance in the PDA criteria).</p>	<p>proposed design are required.</p>	<p>the design and raise the pedestrian platform from 6m to 12m (which was the recommended height clearance in the PDA criteria).</p> <p>If this is not possible, extreme care when selecting surface treatments should be taken to ensure the structure appears as light weight and transparent as possible.</p>
<p>Queens Park</p> <p>The proposed shared zone (pedestrian/cycle/vehicle) running east to west in front of the building substantially reduces the significant relationship between park and the former Lands Administration Building (Treasury Hotel). Even with its reduced scope (from 2 lanes to 1 and with restricted car access) the shared zone is not an appropriate outcome. The opening in the park to allow views and access into the below-ground retail spaces will also adversely impact the historic form of the garden, the relationship between its landscape elements and the overall form of the park. We acknowledge that adequate access to retail spaces is a vital component of their long-term commercial success, however introducing a 500m² opening in the park is not an outcome consistent with the Burra Charter principles or with the PDAs CHAR.</p>	<p>The NTAQ commends the DA requirement that the shared zone is required to be one lane, for one-way traffic only and is restricted to drop off/pickups of hotel guests.</p> <p>The NTAQ is satisfied that all memorial statues and plaques will be retained.</p> <p>The NTAQ is disappointed that the option for a large opening in the park to allow views and access into an underground retail complex has been deemed an acceptable option. Our stance is that this is not appropriate for the heritage significance of Queens Park and will have an adverse impact on the park's heritage significance.</p>	<p>We strongly recommend that the development avoids creating excessive openings in the Park or minimising the areas of green space available to city residents and visitors.</p>



<p>Harris Terrace & The Mansions</p> <p>The proposed new residential towers located to the rear of these two properties, whilst setback from the historic buildings (7m setbacks), comprise a cantilevered section that projects into the setting (via the airspace above) of these important historic residential buildings. The cantilevered section significantly affects the significance of these buildings and their settings. We would recommend not including projecting sections over the top of historic buildings.</p>	<p>Regrettably, the DA conditions did not alter the setback between the heritage buildings and the new towers, nor did it amend any cantilevering effects. As currently proposed, the development will have an adverse impact on the heritage setting of The Mansions and Harris Terrace.</p>	<p>We strongly recommend that the development takes greater concern for the heritage settings of the historic buildings within and adjacent to the development precinct.</p>
<p>Building setbacks</p> <p>The proposed setbacks for new works adjacent to heritage buildings are not consistently adequate. The CHAR and the design criteria contained in the Plan of Development clearly and consistently reiterate the importance of adequate setbacks of new buildings adjacent to heritage places, in order to maintain the building's heritage significance. The new buildings on William St in particular do not adequately address this issue</p>	<p>Regrettably, the DA conditions did not alter the setback between the heritage buildings and new development, nor did it amend any cantilevering effects.</p> <p>Of concern is that the DA conditions do not list the CHAR as either an Approved or non-approved report. The CHAR is an extremely thorough, well written document which provides the framework and approach for all the other Queens Wharf design and heritage reports, and is referenced in many other reports.</p>	<p>We strongly recommend that the development takes greater concern for the heritage settings of the historic buildings within and adjacent to the development precinct.</p> <p>We strongly recommend that the CHAR become an Approved document and it should be a requirement that subsequent designs and re-use is compatible with the CHAR recommendations.</p>
<p>CMPs</p> <p>These documents do not have enough detail to adequately determine significance nor to guide future works and restoration. The CMPs for such important buildings should be exemplar</p>	<p>The NTAQ commends the DA requirement for the development of detailed Schedules of Conservation Works for each heritage listed building within the precinct as part of the compliance development stage.</p>	<p>No further recommendations</p>



<p>examples and should be robust enough to guide important design decision, to assess re-use options and to set out detailed restoration and conservation schedules of work.</p>	<p>The NTAQ commends the DA requirement for the development of detailed Maintenance Plans for each heritage listed building within the precinct.</p>	
<p>Structure of reports and information The current structure makes analysing heritage information extremely difficult as the information on heritage is captured across a huge suite of documents. The NTAQ anticipates these causing issues at the detail design and re-use stages, with important heritage issues being “lost” in accompanying documents. We would recommend the preparation of a “Heritage Handbook” for each heritage listed place, which brings together all the relevant information contained in the various reports for that one specific building. This can then become the “go-to” document for designers, contractors and staff.</p>	<p>The development conditions did not address this issue.</p>	<p>The NTAQ still recommends the preparation of a “Heritage Handbook” for each heritage listed place, which brings together all the relevant information contained in the various reports for that one specific building. This can then become the “go-to” document for designers, contractors and staff.</p>
<p>Inadequate identification of significant views This is inadequately addresses throughout the entire suite of documents. Key view lines are not identified which leads to inadequate consideration and retention of important view lines in the concept plans, design criteria and technical criteria for the project.</p>	<p>Regrettably, the DA conditions do not adequately address this issue, making only extremely minimal changes.</p>	<p>It is essential that key view lines (including those to and from the main elevations of heritage buildings) are identified so that they can be retained and appropriately addressed by the development.</p>



<p>Inconsistencies across the documents Some of the documents clearly outline design goals, parameters and important aspects in relation to heritage; however the following proposed works and design criteria are at times inconsistent with the guiding documents.</p>	<p>Regrettably, the DA conditions do not adequately address this issue.</p>	<p>We still recommend that the inconsistencies are addressed so that the documents retain their respectability.</p>
<p>Heritage Interpretation With the Queen's Wharf development there exists the opportunity to introduce a landmark heritage interpretation, but the guiding document for interpreting the cultural heritage significance exhibits little innovative or creativity in its approach.</p>	<p>The NTAQ commends the DA requirement for the development of a detailed Interpretation Strategy and Design.</p>	<p>The NTAQ would welcome the opportunity to be involved in the development of the Interpretation Strategy and Design.</p>



Other DA Conditions of Note

- Register of Interests and Stakeholder Management Plan (Condition 2 and 3)

The NTAQ notes that the DA Conditions require the development of a Register of Interests. We note that to be on this register, you must be a current landowner or tenant. The NTAQ office was at the former Immigration Depot (known as National Trust House) within the Queens Wharf precinct from November 2002 until early 2017. The NTAQ only moved from National Trust House to directly facilitate the development of the Queens Wharf precinct. We will be moving back into the Precinct at the conclusion of the development.

Action: Accordingly, the NTAQ should be placed on the Register of Interests, actively consulted about the development and kept up to date on its progress.

The NTAQ is Queensland's largest cultural heritage organisation with a strong, independent voice for the protection, conservation and celebration of Queensland's heritage.

Action: The NTAQ should be included in the Stakeholder Management Plan and it should be a requirement to undertake consultation with our organisation regarding the heritage management aspects of the development.

- Compliance Assessment – Heritage Impact Statements (Condition 100)

We note that Condition 100 requires that Heritage Impact Statements (HIS's) should be prepared for all works on or adjacent to heritage places.

We agree with the level of detail to be included in the HIS's as stated in Condition 100, however, we have serious concerns about the lack of consultation required at the Compliance Assessment stage.

The approved development's design a broad overview of the scope and design of Queens Wharf. It did not include detailed options for the reuse of heritage buildings, changes to their fabric or layout; areas open to public access, and their interpretation. These are essential details in which the community of Queensland has a deep and vested interest. It is an immense weakness in the system that the HIS's which will provide the detail for this work over the next six years are not undergo a public consultation or public exhibition.

The historic buildings in the Queens Wharf precinct represent the largest and arguably the most significant collection of early government buildings in the State – the NTAQ believes that the community has the right to be included in the detailed decision and designs for their development, use and interpretation.



SUMMARY OF RECOMMENDATIONS

- We strongly recommend that the developments proponents reconsider the design of the William Street overpass and raise the pedestrian platform from 6m to 12m (which was the recommended height clearance in the PDA criteria).
- We strongly recommend that the development avoids creating excessive openings with Queens Park or minimising the areas of green space available to city residents and visitors.
- We strongly recommend that the development takes greater concern for the heritage settings of the historic buildings within and adjacent to the development precinct.
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- We strongly recommend that the CHAR become an Approved document and it should be a requirement that subsequent designs and re-use is compatible with the CHAR recommendations.
- We strongly recommend that key view lines (including those to and from the main elevations of heritage buildings) are identified so that they can be retained and appropriately addressed by the development.
- We recommend that the inconsistencies within advice and policies across the suite of documents are addressed so that the documents retain their respectability.
- The NTAQ would welcome the opportunity to be involved in the development of the Interpretation Strategy and Design.
- The NTAQ should be placed on the Register of Interests, actively consulted about the development and kept up to date on its progress.
- The NTAQ should be included in the Stakeholder Management Plan and it should be a requirement to undertake consultation with our organisation regarding the heritage management aspects of the development.

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 Senior Advocacy Advisor, Jane Alexander on:

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