



Australian
Institute of
Architects

Australian Institute of Architects

Spring Hill Draft

Neighbourhood Plan

**Submission to
Urban Renewal Brisbane
Brisbane City Council**

June 2016

SUBMISSION BY

Australian Institute of Architects
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PURPOSE

- This submission is made by the Queensland Chapter of the Australian Institute of Architects (the Institute) to: Urban Renewal Brisbane, Brisbane City Council, GPO Box 1434, Brisbane Qld 4001.
- This submission has been prepared with the assistance of the Queensland Chapter Heritage Committee.
- At the time of this submission the Executive of the Institute is: Prof Ken Maher (National President), Richard Kirk (President-Elect), Jonathan Clements (Immediate Past President), Helen Lochhead and Philip Griffiths.
- At the time of this submission the President of the Queensland Chapter is Bruce Wolfe FRAIA.

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 12,400 members, of which 6,840 are architect members. Members are bound by a Code of Conduct and Disciplinary Procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.

Where does the Institute rank as a professional association?

- At approximately 12,400 members, the Institute represents the largest group of non-engineer design professionals in Australia.



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I am making this public submission regarding the Spring Hill Draft Neighbourhood Plan in my capacity as the current Chapter President of the Queensland Chapter of the Australian Institute of Architects (the Institute).

While as an organisation, the Institute generally commends Brisbane City Council for its continuous efforts in maintaining our city's distinctive built form and subtropical character, we believe it is appropriate that the Institute provides some feedback outlining a series of concerns that we hold in relation to the upscaling of potential development yield in certain locations and the possible ramifications of same on the unique, fine grain character of Spring Hill as a city fringe locality.

The areas of concern that the Institute would seek to bring to Council's attention are as follows:

Significant reduction in extent of *Traditional building character overlay* within the study area

It is noted from Spring Hill neighbourhood plan map OM-020.1 it is proposed that a large number of Spring Hill properties could be removed from the *Traditional building character overlay*, which engage Council's demolition protection provisions in the planning scheme; *City Plan 2014*. From our approximation, it would appear that the extent of this contraction of demolition protection (as indicated by the area of red hatching on this map) is of the order of 50% of the total extent of this *overlay* presently in force within this area.

There are aspects of this contraction in demolition protection that appear to have been initiated to address other issues; for example – the removal of the *overlay* from the locally significant Terrace School and State significant Brisbane Central State School removes the current "double up" of demolition protection where the *Traditional building character overlay* and the *Heritage overlay* are mapped to co-exist on the same site. In these instances, the engagement of heritage conservation principles due to the *Heritage overlay* clearly already provides a higher degree of demolition protection on these particular sites. However there are also large areas where the *Traditional building character overlay* is proposed to be removed in anticipation of larger scale redevelopment of amalgamated sites; such as is the case along the major road corridors of Gregory & Saint Paul's Terrace and Boundary Street.

In this regard, the Institute would request the Council gives greater consideration to the proposed contraction of this *overlay*, having regard for the scale and type of existing development in the areas where the *overlay* will be removed as well as acknowledging the manner in which the existing demolition protection provisions of the 1987 Town Plan, *City Plan 2000* and now *City Plan 2014* have been successful in preserving the Colonial era residential construction found across many pockets of Spring Hill.

Table 7.2.19.5.3.B – Maximum Building Height in Storeys

It is noted that the Spring Hill Draft Neighbourhood Plan includes a revised Table of Maximum allowable building heights, which takes into account the combination of the land use zoning and the site area of the proposed site (in an ascending scale). We also note that the incremental scale of Maximum building heights – based upon development site area – is relatively similar to that found in recent Neighbourhood Plans adopted by Council for the Eastern Corridor and Fortitude Valley areas.

The nature of our concern is focussed on the potential for building heights of up to 30 storeys to be permissible on Principal Centre site if the appropriate development site area of >1,800m² can be amalgamated in a locality as well as other areas (i.e. mixed use zone) where building heights of 15 or 20 storey are permissible but the predominant residential lot size is around 200m². This situation is amplified by the likely sites being targeted for more intense forms of redevelopment being along the main road corridors which, in the case of Gregory and Saint Paul's Terrace, predominantly run along the ridgelines within the NP study area. The combination of these two factors opens the possibility of large towers (up to 20 storeys in height) being approved on larger landholding substantially out of scale with the prevailing fine grain subdivision pattern extant in the locality and emphasising the scale difference between the small, domestic scale development along each side street and the modern towers being constructed along the adjacent ridgelines.

It is considered that the incentivization of development outcomes based purely on available site area (as has been the case with the Eastern Corridor and Fortitude Valley NP's) has produced some distinctly large but otherwise uninspiring multi-unit dwellings in recent times within all of the precincts where this ascending scale of building height has been exercised. It is the view of the Institute that the finer grain, late Colonial subdivision pattern of Spring Hill and the more undulating topography of that locality (compared with the relatively flat development precincts of Fortitude Valley and high density areas within the Eastern Corridor) should demand more sensitive analysis in the Neighbourhood Planning process and generate a far more graduated approach to determining the permissible building height that is appropriate for redevelopment within the Spring Hill area.

This perceived tension between preserving the heritage and character of Spring Hill while allowing for greater density close to the city centre, as outlined above, also generates some specific concerns regarding the conservation of heritage sites generally throughout the Neighbourhood Plan area. In this regard, the Institute acknowledges that Council is endeavouring to balance this tension and should to be congratulated on identifying 11 more pre-1911 buildings and 29 more local heritage sites within the draft Spring Hill Neighbourhood Plan area.

Queensland Heritage Places

In relation to places that are listed on the *Queensland Heritage Register*, there appears to be considerable conflict between the identified heritage buildings being preserved and up-zoning of portions of the Neighbourhood Plan area for high rise development. In some parts of the draft Spring Hill Draft Neighbourhood Plan area - e.g. along Wickham Terrace – there are State Heritage Listed buildings situated on

sites zoned for up to 30 storeys. The plan should recognise that the Queensland Heritage Place represents the highest and best use for those sites or the parts of those particular sites that they occupy and modify the potential for redevelopment accordingly. It is noted that there are 39 Queensland Heritage Places in the draft Neighbourhood Plan area. This issue may also be relevant to local heritage places in this locality.

Modern Buildings

The Institute has recently been championing the recognition of modern architecture, e.g. nomination of the Queensland Cultural Centre to the *Queensland Heritage Register*. The Spring Hill Draft Neighbourhood Plan does not appear to recognise the heritage significance of modern architecture, which could be considered quite a short-sighted approach to maintaining the architectural history of our city. While the (former) Main Roads building (Karl Langer 1967) is now on the Queensland Heritage Register, there are a number of other important modern buildings, such as the Tower Mill Hotel (Stephen Trotter 1968), that have not been attributed with heritage significance and are located on sites zoned for up to 30 storeys in the Spring Hill Draft Neighbourhood Plan.

I trust that these comments will be well received and lead to some reconsideration of both the extent of demolition protection being considered for removal and the manner in which appropriate building heights for new development is determined.

Thank you for your consideration of the Institute's views in this regard.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bruce Wolfe', with a stylized flourish at the end.

Bruce Wolfe FRAIA
President, Queensland Chapter
Australian Institute of Architects