

Brisbane City Council  
GPO Box 1434  
Brisbane Qld 4001

1 August 2019

Dear Sir / Madam,

**Submission: DA 308 Queen Street, Brisbane (DA #A005231411)**

Thank you for providing the opportunity to provide a submission regarding the development of 308 Queen Street, Brisbane, also known as the National Australia Bank building.

The National Trust of Australia (Queensland) has reviewed the development application and notes the following points.

**Proposed Development**

*The following text is taken from Development report prepared by Urbis.<sup>1</sup>*

The development application seeks approval for a Development Permit for Building Work to a State Heritage Place, namely the NAB Building at 308 Queen Street, Brisbane.

A branch of the National Australia Bank (and previous institutions) has been located in the ground floor banking chamber of this building since the mid-1880s, when the building was initially constructed. The bank has advised the current owners that it will be vacating the premises on the expiry of its current lease in mid2019. A new tenant is required for the ground floor banking chamber once the bank relocates.

To facilitate this search for a new tenant and to improve equitable access and visibility for the former banking chamber tenancy, the applicant seeks approval for some modifications to the Creek Street elevation and Queen Street frontage of the building. A new DDA-compliant entrance is proposed off Creek Street, with some internal changes proposed to provide access to the former banking chamber and the new tenancies.

Specifically, the following physical changes are proposed:

Some minor changes are proposed to the Queen Street elevation, including:

- The arched timber sash window and timber architrave to the ground floor in the bay closest to the Creek Street corner will be removed and safely stored on site.
- This element will be replaced with frameless glazing to allow enhanced visibility into the new tenancy in the ground floor banking chamber.



More detailed changes are proposed to the Creek Street elevation, including:

- All seven arched timber sash windows and timber architraves – the five in the central sections and the single window at each end bay – will be removed and replaced with frameless glazing, again to allow enhanced visibility into the new tenancy in the ground floor banking chamber.
- In the central section of the elevation of five bays, the stonework below the central window will be removed and stored on site.
- The wrought iron fence at the street frontage will be dismantled and stored on site.
- The stone wall below the fence at the street frontage will also be removed from its current location and stored on site.

Internally, works of note will comprise:

- Some masonry walls will be removed in certain locations of the interior. From the Queen Street entrance a section of wall on the right hand side of the entrance lobby will be removed to provide for a new entrance to the new retail space in the building (the current office space at the Queen/Creek Street corner). Internal walls to the existing bathroom will also be removed to the north of this corner office space.
- Parts of the internal timber floor towards the Creek Street frontage will be removed to allow for a new entrance lobby at grade off the street.
- New stairs and a glass platform lift are proposed from this the internal lobby to the main floor level of the space. An automatic glass sliding door is proposed at the threshold as the new entrance to the space.
- Equitable access will be provided into this new ground floor off Creek Street, with a small lift proposed within the space to provide equitable access to the retained original floor level. The work improves equitable access to the building with this new entrance off Creek Street.
- Internally new retail spaces and food and beverage outlets are proposed within the current banking chamber floor space. New glass shopfronts are proposed (2,400 mm height and open above) in certain areas of the floor to create new sub-tenancies.



Current facades of the National Australia Bank building, with existing entrance seen off Queen Street

National Trust of Australia (Queensland) is dedicated to the protection, conservation and celebration of environmental, built and cultural heritage.

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Proposed changes to Creek Street façade with new entrance and glazing.

### Significance of the National Australia Bank building

We note that the report prepared by Urbis states:

*It is also readily acknowledged that the NAB Building is a fine example of a Classical Revival commercial building in the Brisbane CBD from the late nineteenth century, and is one of the earliest if not the earliest bank buildings surviving in the city from this period.*

*The high quality of the building materials chosen by the architects and builder, the overall design and the intactness of the external elevations to both streets are factors in this cultural heritage significance.*

The National Australia Bank building is listed as a heritage place on the following registers:

- Brisbane City Council Heritage Register (statutory);
- Queensland Heritage Register (Statutory);
- The former Register of the National Estate (non-statutory); and
- Register of the National Trust of Australia (Queensland) (non-statutory).

The Queensland Heritage Register notes that the building is significant for meeting criteria A; B; D; G and H. Of particular relevance are the following:

#### **Criterion B**

The place demonstrates rare, uncommon or endangered aspects of Queensland's cultural heritage.

The former Queensland National Bank head office demonstrates a rare aspect of Queensland's history, being a substantial and important 1880s commercial building in the Brisbane central business district **which has retained a high degree of external and internal intactness, including much of the original furniture and fixture (our emphasis).**



#### **Criterion D**

The place is important in demonstrating the principal characteristics of a particular class of cultural places.

The former Queensland National Bank head office is important in **demonstrating the principal characteristics of a substantial commercial building in the Classical Revival style, distinguished by the quality of its detailing and materials (our emphasis).**

#### **Criterion E**

The place is important because of its aesthetic significance.

The former Queensland National Bank head office is **important in exhibiting a range of aesthetic characteristics valued by the community, in particular its streetscape value on a prominent corner in Brisbane's central business district** (our emphasis) and its expression of the elan and the solidity which the Queensland National Bank attempted to project in the early 1880s and its high degree of external and internal intactness.

#### **Criterion H**

The place has a special association with the life or work of a particular person, group or organisation of importance in Queensland's history.

The former Queensland National Bank head office has a special association with the life and work of prominent Queensland architect, FDG Stanley, **being one of the finest works attributed to him (our emphasis).**

These assessments of significance clearly demonstrate that a large portion of the building's significance is vested in its streetscape value; the intactness and completeness of its façade; the lack of exterior changes to its fabric; and the quality of its exterior and interior detailing.

We note that the Conservation Management Plan for the building (Robert Riddell Architect, 2002) notes all the areas for proposed modification and removal were ranked as level "A" – that is, areas/elements of high significance. Areas or elements ranked as level A should not generally be modified at all.

#### **Summary of Impact**

The National Trust of Australia (Queensland) strongly feels that the level of proposed changes is unwarranted and will have a significant detrimental impact on the building's significance and on its streetscape value.

Specifically:

- The need for a third entrance into the building is unwarranted. The building already has a primary front entrance of Queen Street and a secondary entrance via Gresham Lane. The level of fabric removal and exterior changes to facilitate a third entrance is unwarranted given the high significance of the streetscape and exterior of the building.



- There is existing equitable access to the building via Gresham Lane, negating the need for additional equitable access.
- The building's fenestration is an extremely significant component of its façade and contributes to its significance, streetscape value and intactness. The high degree of change proposed to the building's fenestration and glazing is unwarranted and will cause an unacceptable level of heritage impact.
- The building is noted for its aesthetic contribution to the streetscape, its high level of intactness and its integrity. It is one of the earliest surviving bank buildings in Brisbane and the most notable work of its eminent architect. The scale of proposed changes to facilitate tenants or views into the building is unwarranted and will have an unacceptable impact on this beautiful and significant heritage place.

Given these findings, we recommend that Brisbane City Council **do not** approve the development application.

Please contact the National Trust on telephone 07 3223 6666 should you wish to discuss this further.

Yours sincerely,



Jane Alexander  
Manager - Heritage Advocacy  
The National Trust of Australia (QLD)

