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Proposed Brisbane CBD Building Height Controls

Paper by

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- Brisbane City Council is to be commended for finally beginning to address in a more coherent way, planning and urban form issues relating to city centre development.
- In the sixties, the original height controls limiting city centre development to 120 feet were jettisoned, and no height limits were in place until, in a famous knee-jerk reaction to the World's Tallest Building (WTB) proposals in 1987, the 250m AHD threshold was introduced, whereby buildings above that height required consent approval.
- Then followed a period of silence for fifteen years, where nothing was said further about the preferred vertical shape of the city.
- Until now, there has never really been a sensible public debate about CBD building heights. Even in the period between 1987 and 1989 when the WTB was being debated, no-one was really discussing the important issues, and public discussion raged around peripheral and unsubstantiated issues such as shadow impacts and aircraft flight paths.
- Hopefully, the provisions that we are now discussing are not another reaction to one project, but rather a considered move to exercise a rational planning approach to the overall shape of the city, and in particular, the city centre.
- When "Living in Brisbane 2010" was first promulgated, many were disappointed that this agenda-setting document made no reference to the well-designed city. The final document was modified in response to public and industry input. "Living in Brisbane 2010" now includes the extra objective, the "City Designed for Sub-tropical Living"; however, the focus seems to have been on the details of building design, more than the overall image of the city, seen as large-scale urban design.
- In this new, draft City Centre Local Plan, some of the big issues about the city's form or design, are starting to be addressed, although there is still nowhere in the Council's planning documents, a vision statement which addresses the design and form of the city as a whole.
- What we seem to be heading towards, however, is the idea that the Brisbane CBD is the high-density heart of the Brisbane region. It has far and away the most dense, eclectic mix of business, government, retail and entertainment facilities in the region, it has a unique setting nestled in the city loop of the

Brisbane River, and that it is highly significant in planning terms as the focus of the City's public transport system.

- Equally important, however, it is the symbolic heart of the south-east Queensland region, and indeed the State of Queensland.
- **The important role of the Brisbane CBD is reflected in its physical form**, notably a concentration of high buildings located in a loop of the Brisbane River. The river **provides a space** around this dramatic collection, which gives it **a hard edge, distinction from its surroundings**, and **provides venues** for viewing it,
 - from the river, in the relatively new city cats,
 - from the increasingly important South Bank / Kangaroo Point recreation and cultural areas, and
 - from the river crossing points, especially the Story Bridge and the Captain Cook Bridge.
- One of the reasons that this distinction has been achieved is the unique and valuable position of Brisbane City Council (compared with other state capital city municipal governments) as a local government responsible not just for the city centre, but also for the surrounding suburban districts. So the visual and functional significance and distinction of the CBD has been able to be managed in a way that was not possible in Sydney, for example, where the aspirations of North Sydney City Council led to a confusing plethora of high rise buildings on the northern side of the harbour. In Brisbane, the restrictive policies of the 1978 Town Plan, which applied to development in the CBD fringe especially, meant that the CBD flourished as the main office location and as a major retail centre, without serious competition from other locations. A lot of good things flowed from that, including the successful Queen Street Mall, and improvements to the riverfront and city streets, in particular. More recently, Council has reinforced this strategy by, in effect, imposing a 10-storey height limit outside the CBD (which applies everywhere except for a few remaining sites at Kangaroo Point).
- Recently, we have had the unexpected rush of building to allow more people to live in the middle of this exciting and vibrant district. It is important that the policy response to this phenomenon is balanced, and properly takes into account, in an imaginative way, the opportunities presented by this flush of economic development.

- The new City Centre provisions seem to be trying to do three things: -
 - Impose an absolute height limit in the CBD of 200m AHD;
 - Shape the CBD height profile by varying the heights across the CBD; and
 - Orient CBD tower development towards a smaller number of larger towers, by imposing minimum site requirements.

- **Is it desirable to impose a maximum height limit of 200 metres AHD?** A number of factors should be considered.
 - First, if someone wants to build a higher building at some time in the next decade or so, there would be conceivably many benefits – there would be a greater intensity of activity added to the existing suite of CBD activities, whether in the form of hotels, offices, observation platforms, restaurants, apartments; isn't this what we want, in the most attractive, complex, urbane, public-transit served district in the city?

 - Secondly, why not have some very high buildings in the heart of the State Capital, this bustling, modern centre of the Pacific Rim, the centre of the fastest-growing region of Australia? Whilst I don't agree with this development project, Sunland is building a 298 metre high, 80-storey building on the Gold Coast, a city that doesn't have a centre. Don't you think it would be appropriate for Brisbane to indicate its role in South-East Queensland, and the whole of Queensland, with a very high building or two in its centre, should the opportunity arise? The wealthy mediaeval families of San Gimignano understood these issues. Melbourne doesn't seem to have been held back from musing about the 560-metre high Grollo tower in the Docklands, because it fears it is not Australia's foremost international centre. Should we be so sensitive?

 - Thirdly, in terms of the way we read the city as whole, high buildings can be used to give messages of intensity and social meaning. In this spread out city, some more, higher buildings than we have now, would provide **stronger** visual cues, **seen from more places**, of where the heart of the city lies, which, by the way, means more properties with "city views", higher values and an improved Council rate base!

- Fourthly, if there is no height limit, and a developer for whatever reason wants to build a building that is significantly higher than others in the CBD, then it will probably tend to stand out in the profile of the CBD, viewed from a distance. However, it will probably then merely come to dominate the skyline, and serve to represent the CBD, more than other buildings, or than the whole skyline, ... at least until other new buildings catch it up. I don't see anything too wrong with this. Its degree of dominance will vary, according to the direction from which it will be viewed. However, I would recommend that, as was the case with the WTB proposal, any significantly higher building than those currently in the CBD, should be required to include a public observation deck, not only to provide people with new opportunities to view our wonderful city, but also to provide greater meaning and ownership for residents who become familiar with the city skyline – they see the building in the distance, and they know they can also go there and be there. When City Hall was the highest building, it had a correspondingly significant role in the life of the city. The city's image will be strong and appropriate if any new, physically dominant building also has significance for the population. The Empire State Building and the World Trade Centre acquired greater meaning for residents and tourists in New York, because people could go to the top and look out.

- Fifthly, the most important issues when considering the amenity of the city centre environment are not the heights of the towers, which will not be readily appreciated within the city – the podium / setback planning already contained in the town plan is more important in creating a satisfactory pedestrian experience, as well as the quality of footpath and other public pedestrian spaces.

- **The second main theme of the provisions, seems to be to plan a pyramid of buildings**, or rather, a flat topped volcano with a hollowed out centre round the Mall. It's actually described, in the proposed plan, as "a distinct skyline of high buildings surrounding the Retail Heart and lower buildings at the City Centre edge". In response, first, I'm not quite sure whether this is the most desirable form for the city, and suggest that we could have a pretty good debate about that. Where is the symbolic heart of the city centre, anyway, and would it really matter? Currently, the highest buildings are along and near the waterfront of the financial quarter, in the east, even though earlier, the heart of the CBD had been

planned to the west, around what is now the Mall. However, a very high building next to Central Station in the north, not far from the mall and City Hall, would be a reasonably central and easily understood focal visual reference point. BCC is currently involved in a new high building at the western edge of the CBD, but that will stand alone, as a western entry point, and marking the end of the mall and the presence of the Council administration centre. **I suspect that we should be more concerned with developing a well-defined district of high buildings across the whole of the CBD, and not worrying about where the highest are.** The high buildings **collectively** represent the CBD, the heart of the city, the region and the State.

- At any rate, the Council's proposals contain a few inconsistencies, which undermine the integrity of the principle.
- First, the map doesn't fit the words, as the highest buildings extend right to the river on the eastern edge of the CBD.
- Secondly, in the zone between Alice Street and Margaret Street, the City Plan prescribes a maximum AHD of 45 metres, which at the top end, means buildings of only 30 metres. Both the Quay West building and the elegant Grosvenor tower at the eastern end each well and truly exceed 45 metres AHD. Surely that battle is over and lost, and a new set of heights should be established which at least reflect the heights of the existing towers. That raises another issue, namely, the use of AHD in the way proposed, might not provide the best outcome. With respect to Alice Street and views from the City Botanical Gardens, a profile reflecting the natural topography might be more appropriate than a horizontal plane. I don't think there is anything much wrong with having the high buildings of the city centre visible from the park. One could accept a one-block setback zone of lower buildings, perhaps, but it doesn't have to be as low as proposed.
- Thirdly, P4 of the Code's performance criteria suggests that new towers should "not be taller than other buildings in the vicinity" and "be one of a group of similarly tall buildings". Let's have a look at a particular part of the proposed high, 200 metre zone, at the top end of the Mall. In this area, there are three low heritage buildings, the City Hall, the Treasury Building and the Conrad Hotel, Queens Park, and the low Supreme Court building, leaving only two development sites, the existing Brisbane Administration Centre and the proposed new City Admin Building. The fact that this new administration

building is isolated from other tall buildings, and at the edge of the CBD, shows how difficult it is to apply this template to the CBD. I'm not suggesting that it is inappropriate to have a tall, **western** gateway building at this entry point to the city centre, but rather that fitting this even, pyramid concept to the city form is unsatisfactory – it doesn't work, in this notable case.

- Fourthly, you will remember the North Bank planning exercise undertaken by the State Government, with significant input from BDA and UDAL. A number of the options had buildings of varying height along the freeway. **All** of the options had a building of 20 storeys plus on the government carpark at the junction of William and Margaret Streets. I think the government wants to put a high building there! Is the Council trying to stop that, or is it an oversight? It seems to me that we may be heading for another, **south-western** gateway building in this location, which would be inconsistent with the 45m AHD height limit proposed in the draft plan.
- We can probably all think of examples. However, here is another one. Wouldn't it be good, in principle, to allow some dense development nearest to the railway stations? What about allowing an intensive redevelopment of the ugliest buildings in the CBD, the Roma Street Transit Centre. A tall building here could serve as a new, **north-western** CBD gateway landmark. Or if a tall building was constructed near the transit centre, it would distract from the ugliness of the existing black buildings, which are presently dominant in the landscape.
- What about some intense development over rail, near to Central Station? The proposals wouldn't allow for this, either.
- **The third theme is to promote a smaller number of larger towers – is this a desirable strategy???** The expressed rationale is to conserve sites for larger, **commercial** development projects. However, the provisions will not by themselves lead to that outcome; they may merely lead to larger residential projects, such as the Aurora project at 420 Queen Street. Furthermore, some projects which have made useful recent contributions to the supply and quality of offices in central Brisbane, namely 175 Eagle Street and the Hall Chadwick Building, would barely have met the proposed minimum criteria. Is Council sure that there are not some smaller sites that would be suitable for building new, mid-sized office towers, that should not be excluded from this form of development, instead forced to be developed with lower floor space yields?

- A concern has been expressed that development of tall towers on small sites does not lead to good outcomes for the occupiers – there is a spectre of tall, thin buildings, side by side, with little space between them, and therefore low amenity for users. However, it depends upon the site. Some candidate sites have special characteristics that provide an appropriate setting, such as multiple street frontages, low adjoining buildings unlikely to be redeveloped, and/or nearby open spaces. These and other design factors are more likely to be significant, than merely the frontage and area of the site.
- Apart from these three main themes of the proposed provisions, there may be other, more important factors, which the provisions do not seem to address.
- In most parts of the city centre, from the point of view of people using the city centre itself as opposed to viewing it from afar, the heights of the towers, whether twenty-five or eighty storeys, is not particularly noticeable. However there are some parts of the city centre (the City Botanical Gardens and the City Mall are two), where the heights of the closest towers may be an issue. Another is the axis through the middle of the CBD, from Central Station, through Anzac Square, Post Office Square, the GPO, and St Stephens Cathedral. This space not only is delightful, and a place for gathering, etc, but it provides a welcome respite from the intense built form of the city towers, and pleasant views from the towers around the space. There is also a regularity to the buildings along the axis, which is appealing. The axis curls around into Elizabeth Street. Whilst the draft plan provisions provide for some assessment of proposals that would impact on the “sun in public places”, the building height provisions nevertheless allow for 200 metres AHD in and around this axis, which could be undesirable in a number of ways. For example, a very tall building on the old Telecom site might detract from the quality of this axis.
- Perhaps the provisions should, in some respects, be more fine-grained. The provisions that allow high buildings in and along the axis from Central Station to St Stephens Cathedral may be inadequate, for example.

Conclusions and Recommendations

My conclusions are as follows.

- The City Centre is one of the City's greatest assets, functionally and symbolically.
- The most important framework for understanding the environment of the city from within is at pedestrian level, and for the most part, it is development below podium level, the footpaths and public spaces, which is important in this framework – the heights of the towers are largely unimportant. The significance of tower height is mostly when viewing the city centre from outside the city centre.
- The city centre has the richest measure of many things, and in principle, the strategy should be to provide as much opportunity as possible for offices, retail, culture, education, administrative functions and residences, within the city centre.
- The city centre is relatively compact; therefore, we need to provide accommodation of these activities in towers, and they might be very high towers.
- The city centre is going to take shape over a long period, and be required to respond to needs which we cannot foresee at this time, just as we did not, in the past – we should try to develop strategies that are sufficiently robust to accommodate an array of reasonable future demands.
- We need to consider whether some issues are really very significant in these deliberations, such as shadow effects, traffic congestion and overcrowding – my view is that other things are more important; more important is the quality of the street environment and other elements of the ground level public domain, and maybe some internal spaces and vistas. There may be some other, more fine-grained design principles that should be instituted, not presently included in the draft provisions.
- In considering the height and profile of the CBD when viewed from afar, the most valid starting point is to read the CBD as a whole, rather than trying to get it shaped in some particular way. My opinion is that the proposed flat-topped volcano is not a practical, sustainable, or even desirable objective. In fact we seem to have a medium term scenario emerging that looks more like a distinct district with some tall gateway landmark buildings at the edges.
- For more than thirty years, there has been no limit on the height of buildings, albeit a requirement to obtain consent for

very high buildings, for the last fifteen, without expressed criteria for refusing any such very high building proposal. Given the compact, well-served, imageable, high quality city centre which has emerged, we should consider committing to continuation of that strategy.

- Abolish the impact-assessable height threshold and introduce a code for very high buildings, but only to impose an extra layer of design quality assessment, and to require that any very high building, say twenty metres higher than the next highest, should provide a public viewing platform at the top; that will help fix it better in public perceptions, as well as to provide a valuable public facility.
- If there really is a valid concern about residential development taking over valuable sites for future office development, then consider addressing that directly by zoning, rather than by indirect, cruder methods that probably won't work.
- You may not agree with all of what I have put forward here, and I don't mind. Some romantic souls might take the view that we are a more modest friendly city, whose CBD is set in a lazy loop of a slow-moving sub-tropical river, and we don't want very tall buildings that convey a different, more urban image! What I think is important, however, is that there **is** further, public discussion about these important issues, and that that discussion is backed up by appropriate, transparent research. From what vantage points is it important to consider views of the city centre? Some should be nominated, and then we can begin to have an informed discussion, based on what alternative city centre forms will actually look like, from locations where people actually form their impressions of the city centre, which in turn influence impressions of the city as a whole.
- Finally, the discussion should continue in a wider context. Brisbane City Council can convene that wider discussion because it also manages the city centre surrounds, and can implement the logical strategic conclusions. My view is that the heights of buildings outside the city centre should be limited. There shouldn't be high buildings on South Bank or in the Valley, because of the scale of development in those areas now, and because limiting height in these districts serves to highlight and strengthen the singular role of the city centre.