



,SARA reference: 2111-25872 SPL  
Applicant reference: Broadway Hotel

17 December 2021

Don Carbone  
C/- Planning Initiatives  
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Attention: Mr Liam Holliday

Dear Mr Holliday,

## **SARA Pre-lodgement advice - 93 Logan Road and 44 Balaclava Street, Woolloongabba QLD 4102**

I refer to your pre-lodgement request received on 11 November 2021, in which you sought pre-lodgement advice from the State Assessment and Referral Agency (SARA) regarding the proposed development at the above address. This notice provides advice on aspects of the proposal that are of relevance to SARA.

### **SARA's understanding of the project**

The proposal is an extension and alterations to existing heritage building (Broadway Hotel) and the introduction of a multiple dwelling.

### **Supporting information**

The advice in this letter is based on the following documentation that was submitted with the pre-lodgement request.

| Drawing/report title | Prepared by           | Date             |
|----------------------|-----------------------|------------------|
| Submitted plans      | Red Door Architecture | 10 November 2021 |

## **Pre-lodgement advice**

The following advice outlines the aspects of the proposal that are of relevance to SARA.

| Key matters and action items |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| 1.                           | <b>General</b> <ul style="list-style-type: none"><li>(a) SARA supports reinvigorating the hotel use at the Broadway Hotel, and the adaptation of the broader site to support the restoration. The documentation provided prior to the pre-lodgement meeting does not describe the proposal in adequate detail to enable SARA to undertake an initial assessment against SDAP State Code 14.</li><li>(b) SARA strongly supports the development of a conservation management plan (CMP) for the Broadway Hotel to determine the most appropriate actions to conserve its cultural</li></ul> |

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|    | <p>heritage significance. The Department of Environment and Science (DES) are available to discuss an assessment of significance of the hotel, conservation policies, and to provide any research resources held by the department. It is recommended the CMP addresses options for adaptive re-use and includes a detailed analysis of the fabric and its significance.</p> <p>(c) It is recommended additional pre-lodgement advice is sought at a later meeting when the design is further developed to include adaptation of the hotel and actions for its conservation.</p> <p>(d) SARA is available to provide comment where appropriate on correspondence from the applicant. This includes updates to the documentation or further discussion of the initial strategies. Comment could be provided via email prior to a future meeting.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2. | <p><b>Tower proposal</b></p> <p>(a) SARA is less concerned about the layout of the proposed tower and its appearance to the rear and side of the hotel, where such aspects do not directly impact on the structure (including maintenance access) and/or aesthetic significance of the hotel. An updated proposal for additional pre-lodgement advice should include documentation of the visual impact of the proposed tower on key views to the hotel.</p> <p>(b) It is necessary to consider and address State Development Assessment Provisions (SDAP) State Code 14: Queensland heritage. Performance Outcome 2 (PO 2) is relevant and can be referred to in DES's SDAP Guideline - <a href="https://www.qld.gov.au/data/assets/pdf_file/0020/67133/sdap-heritage-statement.pdf">https://www.qld.gov.au/data/assets/pdf_file/0020/67133/sdap-heritage-statement.pdf</a>. Such considerations may include designing a transition interface with the existing Hotel that is compatible in scale and design. Appropriate setbacks will also be required to allow for conservation of the hotel. Furthermore, careful design of additions will be necessary to avoid obscuring significant features of the hotel.</p> <p>(c) With regard to the addition of structures that are separated from the original Hotel, SARA's focus is on the impact such works and any new laneway structure will have on the hotel through vibration / excavation and proximity. The risks should be managed by obtaining the advice of an engineer with an understanding of the existing condition of the Hotel, obtaining geotechnical information and addressing preliminary construction methods.</p> |
| 3. | <p><b>Demolition</b></p> <p>(a) The proposed scope of demolition outlined in the pre-lodgement package will result in considerable detrimental impact to the cultural heritage significance of this State heritage place. To satisfy the relevant performance outcomes of the SDAP State Code 14: Queensland heritage, the retained three-storey section of the hotel (both exteriors and interiors) should be conserved, reconstructed, and adapted in accordance with sound heritage conservation practices.</p> <p>(b) SARA is unlikely to support removal of both the one-storey and two-storey wings to the rear of the hotel unless an agreed scope of conservation works is undertaken, either prior to / or concurrent with removal of the aforementioned wings.</p> <p>(c) An application must demonstrate that the detrimental impacts on cultural heritage significance resulting from demolition of the one and two storey wings of the Hotel and other significant structures at its rear are appropriately mitigated.</p> <p>(d) Developed documentation for additional pre-lodgement advice must include the extent of demolition to the hotel interiors that is required to facilitate any proposed use. It is unlikely demolition in excess of the extent shown in the Concurrence Agency Response issued in 2017 would be supported; although removal of non-significant fabric that has been identified would have no detrimental impact on significance.</p>                                                                                                                                                                                                         |

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|    | <p>(e) It is recommended options to reduce detrimental impact should be explored, particularly with the extent of demolition proposed to retain the legibility of the forms of the early one and two storey sections at the rear.</p> <p>(f) There is some concern at the requirement for additional demolition to create new openings in the exterior walls of the 3-storey section of the hotel. It is acknowledged the nominated areas are less significant than the street facades. However, the detrimental impacts should be reduced and avoided through design changes with guidance from the engaged heritage architect. For example, undertaking a fabric analysis to identify areas that are less intact on those sides of the building.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4. | <p><b>Conservation works</b></p> <p>(a) The documentation provided does not describe the necessary conservation and reconstruction works required to adaptively reuse the Hotel.</p> <p>(b) Any application must adequately describe the work required to reconstruct the retained sections of the hotel in accordance with best practice conservation principles.</p> <p>(c) The extent of restoration must be determined by an analysis of the physical fabric and documentary evidence undertaken by a heritage architect to inform the works.</p> <p>(d) Any proposed new use/s for the hotel should enable ongoing public access and appreciation of the heritage place. While other uses may be compatible with the significance of the hotel, the ongoing use would preferably be a public bar, or similar, to recall an important part of the place's cultural heritage significance.</p>                                                                                                                                                                                                                                                                                                      |
| 6. | <p><b>Additional advice:</b></p> <p>(a) The approach to install the ancillary functions (i.e. kitchen and lift) of the hotel in a separate building at the rear may be a good strategy to reduce detrimental impact on the fabric of the hotel. The developed proposal should, however, demonstrate why reinstating the hotel use with integration of the necessary ancillary areas within the existing building would have more detrimental impact on cultural heritage significance.</p> <p>(b) Any proposed new use, or reinstatement of use (and associated change of classification under the National Construction Code), must consider the extent of works required to be undertaken to the hotel to ensure current building standards can be met (i.e. equitable access and amenities, fire services and fire separation). Strategies to satisfy those requirements must be outlined in any application.</p> <p>(c) An application would need to explain the existing structural integrity of the place (including the roof and turret) to determine how the fire-damaged elements can be retained, repaired, and incorporated into conservation, reconstruction and adaptive reuse works.</p> |

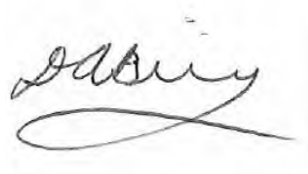
This advice outlines aspects of the proposed development that are relevant from the jurisdiction of SARA. This advice is provided in good faith and is:

- based on the material and information provided to SARA
- current at the time of issue
- not applicable if the proposal is changed from that which formed the basis of this advice.

This advice does not constitute an approval or an endorsement that SARA supports the development proposal. Additional information may be required to allow SARA to properly assess the development proposal when a formal application has been lodged.

If you require further information please contact Anthony Sapuppo, Senior Planner, on 3452 7677 or via email [BrisbaneSARA@dsdilgp.qld.gov.au](mailto:BrisbaneSARA@dsdilgp.qld.gov.au) who will be pleased to assist.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Darren', with a long, sweeping horizontal flourish underneath.

Darren Brewer  
Planning Manager - SARA Brisbane Region