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Wednesday, 22 April 2026

The Chief Executive
Planning and Heritage Branch
Department of the Environment, Tourism, Science and Innovation
GPO Box 2454
Brisbane QLD 4001
Email: heritage@detsi.qld.gov.au

Re: Submission under s.42 of the Queensland Heritage Act 1992 – application to remove part of the Main Roads Department Building (former), 477 Boundary Street, Spring Hill (QHR 602830)

Dear Chief Executive,

The Queensland Chapter of the Royal Australian Institute of Architects makes this submission in response to the notice of a compliant application under section 36 of the Queensland Heritage Act 1992 seeking to remove part of the Main Roads Department Building (former), 477 Boundary Street, Spring Hill, from the Queensland Heritage Register.

This submission is informed by the advice of the Queensland Chapter Heritage Committee, comprising experienced practitioners in heritage conservation and statutory heritage assessment. The Committee has reviewed the proposal having regard to the Queensland Heritage Register citation, the statutory heritage framework and accepted conservation principles.

The Institute opposes the proposed removal.

In our view, the land proposed to be excised forms part of the identified cultural heritage significance of the place and continues to contribute to the heritage values for which the place is entered in the Register. In particular, the designed landscape setting of the place, including the side gardens as well as the forecourt, is integral to the way the place is understood, appreciated and experienced.

The Statement of Cultural Heritage Significance does not support a narrowed reading of setting that isolates the forecourt and diminishes the contribution of the flanking garden spaces. The relationship between building and landscape is part of the significance of the place. The side gardens contribute to the spatial composition, visual setting, and public appreciation of the former Main Roads Department Building as an important work in its urban context.

While it is acknowledged that the condition of the garden has declined over time, neglect should not be treated as evidence of diminished significance. In this case, the primary heritage value of the side garden lies not merely in individual plantings, but in its role as designed open space contributing to the setting, visibility and appreciation of the building. Major hard landscape elements remain, the spatial framework is still legible, and there is sufficient documentary evidence to support reinstatement of the landscape intent.



The Institute is also concerned that reducing the registered boundary would create a curtilage that no longer reflects the place described in the Register. It would materially weaken protection of the designed setting and may facilitate future development outcomes that further erode the visibility, presentation and understanding of the place in the streetscape.

The Queensland Chapter has recently highlighted the broader issue of neglect of heritage places in its response to the Queensland Heritage Review. That concern is directly relevant here. Deterioration resulting from inaction should not become the basis for reducing heritage protection, particularly where the significance of the place remains evident and recoverable.

For these reasons, the Queensland Chapter endorses the attached Appendix A, being the technical submission prepared by its Heritage Committee, and respectfully submits that the land proposed to be removed should remain within the Queensland Heritage Register boundary.

Sincerely,

Handwritten signature of Peter Gardiner in black ink.

Peter Gardiner
Queensland Chapter President
Australian Institute of Architects

Handwritten signature of Kim Richards in black ink.

Kim Richards
Executive Leader, Queensland
Australian Institute of Architects

Attachment: Appendix A: Technical Submission RAIA Queensland Chapter Heritage Committee

Appendix A: Technical Submission under s.42 of the Queensland Heritage Act 1992

Application to Remove Part of the Main Roads Department Building (former)
477 Boundary Street, Spring Hill
Queensland Heritage Register No. 602830

Prepared by

Queensland Chapter Heritage Committee
Royal Australian Institute of Architects

1. Introduction

This technical submission has been prepared by the Queensland Chapter Heritage Committee of the Australian Institute of Architects in response to the notice of a compliant application under section 36 of the Queensland Heritage Act 1992 to remove part of the above place from the Queensland Heritage Register. This submission accompanies and supports the covering correspondence provided by the Queensland Chapter of the Royal Australian Institute of Architects.

It provides a detailed assessment of the subject land against the cultural heritage significance criteria under section 35 of the Act. It is the opinion of the Committee that the land proposed to be removed forms part of the identified cultural heritage significance of the place and continues to satisfy the relevant criteria. Accordingly, the subject land should remain within the registered boundary.

2. Criterion D – Principal characteristics and the extent of the setting

Criterion D identifies, as a principal characteristic of the place, *“the urban public space used as the setting for the building”*. The Register entry makes clear that this setting is not confined to a single element but comprises a coordinated landscape arrangement including the forecourt and the flanking side gardens.

The side gardens are described as retaining the original abstract layout and incorporating terraces, retaining elements, circulation paths and seating. These elements contribute to the spatial definition of the building's setting and to the way in which the place is experienced and understood.

The current proposal does not seek to remove the forecourt. However, it does seek to remove the side gardens from the State heritage register boundary. In doing so, it adopts an unduly narrow interpretation of setting, effectively treating the forecourt as the sole or sufficient expression of significance.

That approach is not supported by the Register citation, which identifies the setting as a broader composition. Removal of the side gardens would result in a reduced and incomplete curtilage that no longer fully demonstrates the principal characteristics of the place.

3. Criterion E – Aesthetic significance and the unity of the landscape composition

Criterion E identifies the aesthetic significance of the place, including *“the abstract, graphic layout of the forecourt and side gardens, including pond and entrance bridge”* and *“the former Main Roads building is highly visible from the surrounding suburbs and maintains an imposing streetscape”*

The wording of the citation is explicit in attributing significance to the combined composition of the forecourt and side gardens. The aesthetic value arises from their integration as a single, coherent landscape design.

An interpretation that elevates the forecourt while diminishing the role of the side gardens introduces an imbalance that is not supported by the citation. The side gardens are not incidental or peripheral; they extend and complete the abstract geometry of the landscape, providing lateral definition and continuity to the overall composition and significantly contribute to the to the building maintaining its imposing streetscape presence.

The removal of these areas would fragment that composition. In any future development application over the western garden site, there is a high risk that this open space, which maintains the building's visibility and street presence would be lost. With just the forecourt retained, the place would no longer present the full extent of the designed landscape identified as significant, resulting in a diminished expression of its aesthetic qualities which include its streetscape presence.



Figure 1: Perspective drawing of the subject place, illustrating the side gardens in the foreground as an integral component of the building's setting. Source: UQ eSpace, Karl Langer Collection, UQFL158 (p. 17, JDA Co report).

4. Condition, integrity and capacity for reinstatement

It is acknowledged that original planting within the side gardens has changed over time and that the garden has been allowed to deteriorate through neglect. However, the significance of the place is not dependent solely on the survival of individual plantings.



The underlying hard landscape framework, including terracing, retaining walls, paths and spatial organisation, remains in place and continues to express the abstract layout identified in the citation. This framework provides a clear basis for understanding the original design intent.

Importantly, the current condition of the garden should not be relied upon to argue loss of significance. Where the spatial framework, design intent and capacity for reinstatement remain evident, deterioration does not extinguish cultural heritage value.

There is also sufficient documentary and physical evidence to support reinstatement of the landscape intent. Earlier development proposals for the broader site contemplated partial restoration of the Boundary Street upper terrace and associated landscape setting. This demonstrates that the design intent remains legible and recoverable.

Even if individual landscape elements cannot be replicated in every detail, the heritage value of the side gardens lies fundamentally in their role as open space and as part of the designed setting through which the adjacent building is understood and appreciated.

5. Design intent and the work of Karl Langer

The place is a major work of Dr Karl Langer, whose design approach consistently integrated architecture and landscape. At this place, the forecourt and side gardens operate together as a unified composition that frames and reinforces the building.

The side gardens are therefore not merely residual land around the building. They are part of the architectural and landscape conception of the place. Their removal from the registered boundary would disrupt that relationship and reduce the ability of the place to demonstrate both its principal characteristics and its aesthetic significance.

6. Conclusion

The land proposed to be removed forms part of the designed landscape setting expressly identified in the Statement of Cultural Heritage Significance for the Main Roads Department Building (former).

The side gardens are integral to the expression of both Criterion D and Criterion E. They contribute to the principal characteristics of the place, to the aesthetic unity of the landscape composition, and to the ability to appreciate the building in its intended setting.

Notwithstanding changes to planting and condition, the underlying design framework remains intact and capable of reinstatement. The subject land therefore continues to satisfy the cultural heritage criteria under section 35 of the Queensland Heritage Act 1992.

Accordingly, the proposed removal of this land from the Queensland Heritage Register is not supported, and the subject land should remain within the registered boundary.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Gardiner'.

Peter Gardiner
Queensland Chapter President
Australian Institute of Architects

A handwritten signature in black ink, appearing to read 'Luke Pendergast'.

Luke Pendergast
Chair, Queensland Chapter Heritage Committee
Australian Institute of Architects