

9 June 2015



Australian Institute of Architects

Mr Stuart Jardine  
Chief Executive Officer  
City of Stirling  
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Dear Mr Jardine

### **BEAUFORT STREET CORRIDOR DETAILED AREA PLAN**

The Australian Institute of Architects advocates on behalf of the architecture profession and the community to enhance the quality of our built environment. We take this opportunity to comment on the City of Stirling Beaufort Street Corridor Detailed Area Plan prepared in February 2015 and which attempts to put in place very stringent guidance on future development.

At the outset we feel the Plan is overly prescriptive and reads like it was prepared in reaction to what the relevant ward ratepayers have found unpalatable, perhaps reflecting a breakdown in the City's development assessment process. However we also believe that the Plan provides some informative analysis on what makes up the value and character of the existing streets, something that is typically sufficient for a good architect to come up with a well-mannered and creative design with future heritage potential.

The conservation policy on which retention is determined is too simplistic and has no sound basis in the accepted assessment practice. Putting a heritage value on anything built up until 1960, regardless of merit, does heritage a disservice and demonstrates a disregard for the heritage continuum. It may enable decision-making to be a simple process, but it lacks a capacity to differentiate between extremes in heritage value. Under this approach very poor examples of a period and style are captured in the same net as good or very good ones. In the past, decisions made to disallow demolitions using such criteria have by and large been supported by the State Administrative Tribunal (SAT). What that says is that the policy is well founded in planning terms, but does not necessarily make for good outcomes.

Similarly, the guidelines relating to acceptable architectural outcomes in the character protection areas are very narrow, resulting in numerous distortions of architectural history and poor pastiche. Under the status quo decision-making is very simple because R-Code compliance and 'federation' styling is readily supported. There are now enough pastiches to indicate to a discerning eye, that the products are obviously late 20<sup>th</sup> and early 21<sup>st</sup> century imitations of the real thing. Second storey additions in matching styles are sometimes quite unsatisfactorily resolved in an architectural sense, but fit the aims of the character protection guidelines.

We are also concerned about the notion of having four acceptable architectural styles in the DAP: Art Deco; Brick Simple; Brick Decorated and Light Classical in such a diverse street. All but Art Deco are not recognised styles at all, but the document makes clear what it thinks those styles include. There are many difficulties with this notion. The drivers for architectural resolution of any building are now quite different from what they were at the times when various styles arose: building materials are produced differently; the lowest denominator of delineator will not understand the

styles and will likely misappropriate the architectural language and the building trades will put their own spin on interpretation.

Another weakness of this document is that it seems to be implying that a modern architectural expression does not have a role in this precinct. Modern mixed use buildings have aesthetic characteristics that reflect our contemporary patterns of living such as floor to ceiling glass, glazed balconies, sliding screens and sun shades – all reflective of the way we live, and essentially precluded because they don't belong to the styles in this DAP. Similarly, developments in technology that provide improved thermal performance, a sustainable use of materials, and modern construction techniques are potentially being regulated out.

Clearly not all of Beaufort Street has heritage value so a degree of flexibility needs to apply where there is nothing to protect. Indeed with so few current heritage places in sections of Beaufort Street, it could be said that the area would benefit from a bolder approach. The Australia ICOMOS (International Council on Monuments and Sites) Burra Charter provides very firm guidance to architects working in a heritage context.

This DAP uses the same heritage significance criteria that applies in residential areas, in place of a proper assessment process. There is an inherent difficulty in allowing proponents to prepare heritage assessments because they will want to provide their own or owners' views regardless of the merit of the place. A better way to get a heritage value would be for the City to engage consultants to provide a dispassionate assessment and to recover the cost from the proponent. This would provide a more credible outcome and the proponent could then decide whether to proceed or not, leading to assessments being done at or before the time of purchase and before ideas are locked in.

Overall, in our view, it would be a far more effective process to have buildings and street blocks properly assessed under a system that provides basic guidance, but also requires excellence. That system should also include a design review process as is happening in areas of Perth where effective Design Review Panels are in operation. This process is producing some contemporary, well-mannered results in areas of high heritage value such as Perth, Fremantle and Subiaco. It is an approach that would be much more respectful of Beaufort Street's heritage and perhaps lead to the creation of the street's future heritage.

The styles being promoted in this document were once the modern architecture of the day and reflected the best building practice of the time. To promote a strange heritage pastiche is utterly contrary to the Burra Charter which encourages the clear delineation of heritage through the juxtaposition of old and new. Had the city's forefathers applied the notions that the City contemplates now, there would be no diversity at all and no reflection of popular styles and taste through time. They would have thought the proposal is backward looking and would not be impressed with such a retroactive process.

We urge the City in the strongest possible terms to re-consider its approach in order to promote respectful diversity and to demand excellence in design.

Yours sincerely



PHILIP GRIFFITHS FRAIA RIBA M.ICOMOS  
**STATE PRESIDENT WESTERN AUSTRALIA**