

# Application form

Heritage

## Removal of a place from the Queensland Heritage Register

**Use this form** to make an application to have all or part of a State Heritage Place considered for removal from the Queensland Heritage Register under the Queensland Heritage Act 1992.

### Before completing this application form:

- read the *Application Guide: Removing a State Heritage Place from the Queensland Heritage Register* available at [www.qld.gov.au/environment/land/heritage/](http://www.qld.gov.au/environment/land/heritage/)
- call 13 QGOV (13 74 68) and discuss this application with the Applications Co-ordinator, Heritage Branch

### 1. Applicant details

APPLICANT NAME/S The Rev Richard James		TITLE Fr
ORGANISATION NAME (if applicable) The Corporation of the Synod of the Diocese of Brisbane		
POSTAL ADDRESS 447 Main Street, Kangaroo Point		POSTCODE 4169
EMAIL ADDRESS [REDACTED]		
TELEPHONE (business hours) [REDACTED]	MOBILE [REDACTED]	
TELEPHONE (after hours)	EMAIL [REDACTED]	

### 2. Applicant consent

Ticking YES in the box below means you give consent to the department to publicly disclose your name with this application. At no time (whether you tick YES or NO) will your personal contact details be made public during processing and assessment of this application. The department removes contact details (i.e. address, email and telephone numbers) from all copies of the application except those provided to the Queensland Heritage Council.

Applicant consents to personal information being released		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
APPLICANT'S SIGNATURE	[REDACTED]	
PRINT APPLICANT'S NAME The Rev Richard James	DATE SIGNED 2 April 2025	

## Removal of a place from the Queensland Heritage Register

### 3. Place details

NAME OF PLACE AND / OR QUEENSLAND HERITAGE REGISTER PLACE ID NUMBER St Marys Anglican Church (Entry No 600244)	
STREET ADDRESS 433-449 Main Street, Kangaroo Point	
LOT/S ON PLAN/S Lots 1 & 2 on RP11000 and Lot 2 on RP86492	LOCAL GOVERNMENT AREA/S Brisbane City Council
GPS COORDINATES (if known)	

### 4. Consultation with the owner of the place

Do you own the place that is the subject of this application? Yes ☒ No ☐

If you are not the owner of this place, have you consulted with the owner? Yes ☐ No ☐

### 5. History of the place

<p><b>HISTORICAL SUMMARY</b>  <i>Using the history provided in the Queensland Heritage Register entry as a starting point add detail that supports your removal application</i></p> <p>In September 1871, an advertisement was published in the Brisbane Courier seeking an architect to design a new church on this site, to replace an earlier timber church located on John Street (now Rotherham Street). Architect R.G. Suter was chosen to design a stone church with a budget "not to exceed £700". The church was consecrated on 5th November, 1873. The diocesan architect J.H. Buckeridge has claimed authorship of the rectory, constructed by 1889, between the church and parish hall.</p> <p>A cyclone in 1892 destroyed half of the church roof and part of the western façade; however, it was swiftly rebuilt with added features, including the south transept, a lowered floor, and refined interior detailing, overseen by architect G.H.M Addison—all sympathetic to Suter's original design—and was rededicated by February 1893.</p> <p>All three buildings on the site remain largely as originally constructed, with the parish hall having undergone the most changes over time, partly due to its timber construction. A freestanding timber belfry was added around 1929 to the east of the church, and a stone and wrought iron arch was erected at the foot of the driveway in 1931.</p> <p>The siting of St Mary's is most effective. The customary orientation of the chancel to the east means that access is through the north porch. Due to the site's commanding outlook, perched high above the Brisbane River, the church's west door faces the city across the river and forms a strong visual axis. The key view lines to the site are from the west, as seen from the river and Brisbane CBD.</p> <p>St Mary's has a historical link with the adjoining Navel Depot at the bottom of the cliffs to the west. A timber stair to the site existed for many years linking the church site to the Naval Depot, again accessing the site from the west.</p>
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The adjoining site to the south is parkland. There exists a metal palisade fence on the parkland's boundary to St Mary's, with no general access between the two sites. A stand of mature trees obscures much of the site from views from the east. A substantial stone retaining wall mitigates the change in level between Main Street and the site.

Amesbury street, to the north of the site, was cut down by 1923. A simple chain link fence borders the northern site boundary of the church site to the lower Amesbury Street.

The opening of the Storey Bridge in 1940 brought with it associated roadway network changes. The junction of Main Street and Shafston Ave necessitated elevated concrete on ramps and road widening, which affected the means in which St Mary's is physically and visually connected with the community. The vehicle entry gates at Main Street were widened in 2004, and the wrought iron archway taken down at that time.

The small area of land proposed for removal from the heritage boundary has no buildings, trees or elements which contribute to the cultural heritage significance of the place. No known historical event or association is known to exist from this area of the site.

### REFERENCE LIST

Conservation Management Plan, Riddel Architecture, 2009

Conservation Study, Richard Allom Architects, 1985

### LIST OF ATTACHMENTS

Appendix A – Heritage Impact Assessment prepared by Pendergast Architects

Appendix B – Proposal Plans

Cover letter prepared by Urbicus

## 6. Description of the place

### WRITTEN DESCRIPTION

*Using the description provided in the Queensland Heritage Register entry as a starting point add detail that supports your removal application*

St Mary's is a Gothic style church built on a prominent riverside site above the Kangaroo Point quarries. Constructed of Brisbane tuff, it is cruciform in shape, but with shallow transepts and a faceted sanctuary bay. The gable roof, originally timber shingled, is now in ribbed galvanized iron. It is surmounted by a small stone bellcote at the front gable. In the interior, the nave is unlined, and timber trusses, resting on small masonry pillars, support the roof. The sanctuary is lined with plaster and its ceiling features three paintings by the noted artist Godfrey Rivers.

The hall is a timber structure on concrete stumps. Cruciform in shape, it has a gabled corrugated iron roof surmounted by a central ventilation lantern.

The rectory is a large single-storeyed brick residence with verandahs on three sides. It stands on brick piers with honeycomb infill. Entry is through a gabled frontispiece. The verandah has timber posts and balusters. A number of bays on the rear verandah add to the complexity of the corrugated roof which is a series of hips and gables.

The three buildings are clearly visible from the west, as viewed from the Brisbane River and CBD. Due in large part to the topography, mature trees, roadway network and adjoining St Vincent's Hospital built form, views to the site from the north, south and east are less prominent. The pre-lodgement advice (SARA

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reference: 2408-41836 SPL) also states that the principal views of significance of the church precinct are from the western side of the river, and that "The position of the advertising sign at the northern end is expected to have little impact on the visual landmark qualities of the church building".

Within the site, the three buildings are read as a complex of parish buildings, with the church at the highest point on the site. An expanse of asphalt dominates the eastern part of the site adjoining the area proposed to be removed from the heritage boundary, and more intimate garden spaces are located on the south-western corner of the site, adjoining the church's western point.

The small area of land proposed for removal from the heritage boundary has no buildings, trees or elements which contribute to the cultural heritage significance of the place. No known historical event or association is known to exist from this area of the site.

The parcel of land identified for removal from the heritage register is grassed, with no built or natural elements of any particular interest or cultural heritage significance. As explained in Section 7 against each relevant criterion, this small section of the land is not considered to impact on any of the significance criteria. The chainlink fence which runs along the northern site boundary, at the high point to the cliff face transition down to Amesbury Street in a standard fence, likely having been constructed in the last 40 years.

A contemporary wayfinding signage board exist in this area, which is proposed to be relocated as part of the building works. The stone wall which retains the site from the lower Main Street footpath, including the wrought iron fencing, is proposed to remain within the heritage boundary. A previously salvaged steel entry sign with the inscription "St Mary's Church of England" has been secured to the chainlink fence since its removal from the Main Street vehicle entry gates. The signage no longer reflects the naming convention of the parish, however is proposed to be relocated as part of the works to an alternative location within the parish grounds.

The land proposed to be removed from the heritage register will be retained within the ownership of the Anglican Church and will be maintained with the rest of the church site.

### 7. Statement of cultural heritage significance

Explain why the place (or part of it) does not fulfil the significance criteria listed in its entry in the Queensland Heritage Register. Write 'not applicable' against the criteria that are not relevant to your application.

<p>CRITERION A the place is important in demonstrating the evolution or pattern of Queensland's history</p>	<p>Under this criterion, St Mary's significance is recognised as having always been the naval chapel in Queensland; and as having the oldest pipe organ in Queensland and the religious art of Godfrey Rivers. The portion of land proposed for removal from the Queensland Heritage Register does not contain any physical fabric associated with St Mary's Anglican Church. It holds no material connection to Queensland's Naval Chapel, the significant St Mary's Anglican Church pipe organ, or the religious artworks of Godfrey Rivers. As such, this section of the property has no meaningful association with the key buildings or significant elements that contribute to the site's role as Queensland's naval chapel, its pipe organ nor the religious art by Godfrey Rivers in the church.</p>
<p>CRITERION B the place demonstrates rare, uncommon or endangered aspects of Queensland's cultural heritage</p>	<p>This criterion recognises that St Mary's Church is an early and intact religious precinct of church, hall and rectory; and is one of the only 2 surviving stone churches designed by RG Suter. The excision of this area from the heritage boundary will have no impact on the remaining St Mary's Anglican Church or the broader religious precinct comprising the church, hall, and rectory. The stone church, designed by renowned architect RG Suter, will retain its original fabric and its significant spatial and historical relationship with the adjoining rectory and hall. The integrity of this cohesive religious precinct will remain unaffected by the proposed boundary adjustment.</p>

## Removal of a place from the Queensland Heritage Register

CRITERION C the place has potential to yield information that will contribute to an understanding of Queensland's history	Not Applicable.
CRITERION D the place is important in demonstrating the principal characteristics of a particular class of cultural places	The significance recognised under this criterion is identical to the significance recognised under Criterion B. That is, St Mary's Church is an early and intact religious precinct of church, hall and rectory; and is one of the only 2 surviving stone churches designed by RG Suter. The removal of the parcel of land located at the north-eastern corner of the site will not alter the physical fabric of St Mary's Anglican Church. The church, hall, and rectory will continue to represent an early and intact religious precinct. St Mary's Anglican Church will remain significant as one of only two surviving stone churches designed by RG Suter, preserving its architectural and historical importance within Queensland.
CRITERION E the place is important because of its aesthetic significance	<p>Under this criterion, "The building" (i.e. the church building) is recognised as a historical and visual landmark in Kangaroo Point. Principal views of significance supporting the landmark status of the church precinct are obtained from the western side of the river, looking back towards Kangaroo Point. This was confirmed by the SARA pre-lodgement advice from September 2024. St Mary's Church will continue to serve as a historical and visual landmark within Kangaroo Point. Its landmark status, particularly as viewed from the Brisbane River and the city centre, will remain unchanged.</p> <p>The proposed removal of the north-eastern portion of the site will not compromise the church's prominence along the Kangaroo Point ridgeline, nor its role as a historically significant feature of Brisbane's cultural landscape. The SARA advice from September 2024 also says that "criterion E of the QHR entry appears to reference a singular building (i.e. the church)" and the impact of a structure on the section proposed to be removed from the heritage boundary "is not considered significant"</p>
CRITERION F the place is important in demonstrating a high degree of creative or technical achievement at a particular period	Not Applicable.
CRITERION G the place has a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons	The significance recognised by this criterion is the fact that St Mary's has always been the naval chapel in Queensland. This is also recognised under Criterion A. The excision of this land will not affect the church's recognised significance as Queensland's Naval Chapel. The key relationships that underpin the heritage values of the precinct will remain intact, ensuring that the church's cultural and historical associations are preserved.
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 significance recognised under this criterion is identical to the significance recognised under Criteria B and D. That is, St Mary's Church is an early and intact religious precinct of church, hall and rectory; and is one of the only 2 surviving stone churches designed by RG Suter. The parcel of land identified for removal contains no fabric or evidence of any significant element related to St Mary's Anglican Church, hall, or rectory. The removal of this section will not impact on the intactness of the precinct, and therefore historical integrity of the precinct. St Mary's Anglican Church will continue to be recognised as one of the only two surviving stone churches designed by RG Suter, with the precinct's heritage significance remaining fully intact.

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### 8. Site plan showing area of current boundary proposed for removal

Attach a site plan to this form. Any plan/s and map/s in the register entry for the place can be used as base drawings. Tick to confirm:

- ☐ the site plan is drawn or sketched to scale
- ☐ all key elements of the place are shown and clearly labelled in their approximate locations (particularly those elements identified in the register entry)
- ☐ the existing heritage boundary is shown, along with the area proposed for removal (all or part)
- ☐ the cadastral (lot on plan) boundaries of the place are shown

### 9. Photographs

Attach photographs to this application that show the place in its current state. Number all photographs and complete the index table below adding more rows if needed.

If submitting an electronic application, submit the photographs in a digital file attached with the application form. Maximum file size for digital images attached to this form is 250kb each.

If submitting an application in hard copy, submit the photographs as an electronic file saved onto a CD or USB and attach one hardcopy print out of images to this application form.

<p>DATE AND TIME TAKEN Photographs have been included in the Heritage Impact Assessment which describe the current condition of the place, including its Main Street setting, and were taken over two dates, 15<sup>th</sup> November 2024 + 15<sup>th</sup> January 2025.</p>		<p>PHOTOGRAPHER Luke Pendergast Pendergast Architects</p>
<p><b>COPYRIGHT PERMISSIONS</b> By law copyright of material submitted is subject to conditions set out in the copyright licence for that material.</p> <p><i>Please enter licensing details in the metadata for each image/file requiring copyright.</i></p> <p><i>A copyright licence may be obtained free of charge from Creative Commons at <a href="http://www.creativecommons.org">www.creativecommons.org</a>. Creative Commons licence 'Creative Commons Attribution-Non-Commercial-No Derivative Works' is recommended. This licence maintains author copyright but allows others to copy and distribute work provided the author is given credit (in a way specified by the author) and the work is not changed in any way and is not used commercially.</i></p>		
IMAGE NUMBER	FILE NAME	DESCRIPTION

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### 10. Lodgement

All sections of this form must be completed and attachments prepared (in particular the site plan showing the proposed heritage boundary and photographs of the place) before an application is lodged. Incomplete applications cannot be accepted.

**Send one copy of the completed form and attachments to:**

**Email:**  
heritage@des.qld.gov.au

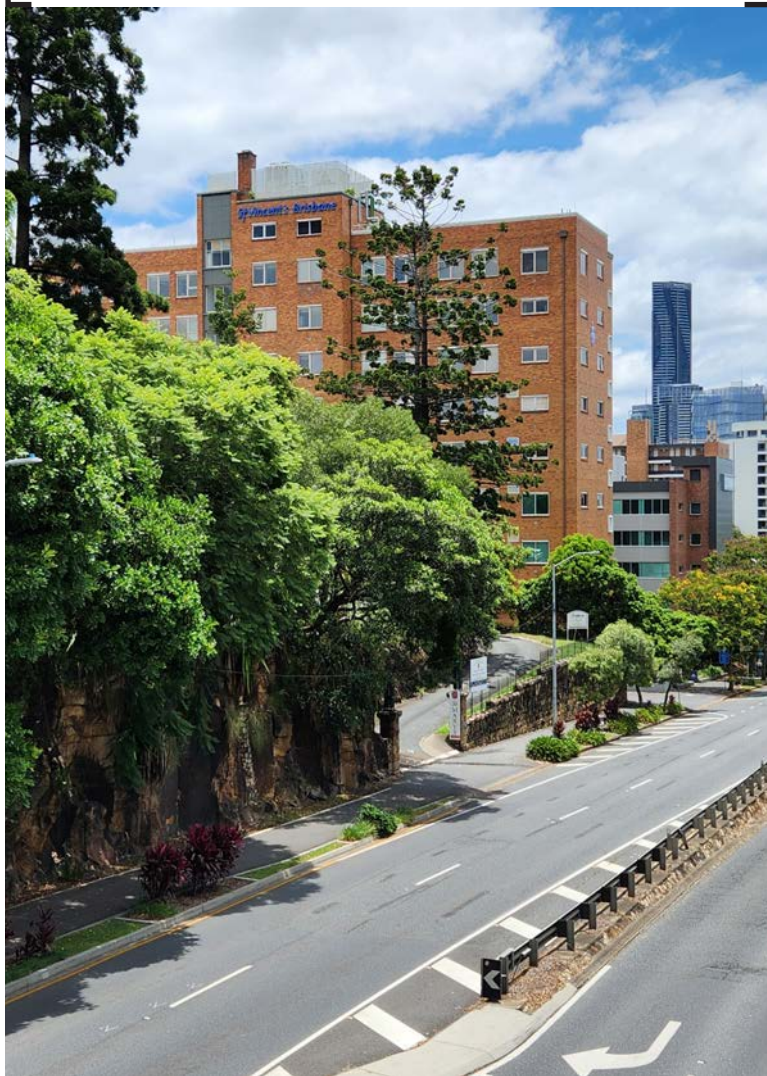
**OR**

**Post:**  
Applications Coordinator  
Heritage Branch  
Arts and Heritage  
Department of Environment and Science  
GPO Box 2454  
Brisbane Qld 4001

### Further information

- email [heritage@des.qld.gov.au](mailto:heritage@des.qld.gov.au)
- call 13 QGOV (13 74 68) and ask to speak to the Applications Coordinator, Heritage Branch
- visit [www.qld.gov.au/environment/land/heritage/](http://www.qld.gov.au/environment/land/heritage/)

# HERITAGE IMPACT ASSESSMENT



## PROPOSED ADVERTISING DEVICE AT ST MARY'S ANGLICAN CHURCH KANGAROO POINT

FOR  
THE CORPORATION OF THE SYNOD OF THE DIOCESE OF BRISBANE

**Pendergast Architects**

HERITAGE

Version: 250407



## 1. INTRODUCTION

1. This report addresses cultural heritage matters related to the proposed removal of parts of the entries on the Queensland Heritage Register to enable future building work for the construction of an advertising device on the subject property.
2. The subject property is St Marys Anglican Church, 433-449 Main Street, Kangaroo Point described as Lots 1 & 2 on RP11000 and Lot 2 on RP86492, comprising a site area of 5,006 m<sup>2</sup>. The property has been occupied continuously by the Anglican Church since 1873.
3. The place is entered in the Queensland Heritage Register (QHR) (Entry No 600244) pursuant to the provisions of the *Queensland Heritage Act 1992*. It is also included in the Heritage Overlay of the City Plan as a Local Heritage Place. The QHR and Brisbane City Council (BCC) heritage boundary, includes all three lots, as shown at **Figure 2**. See also contemporary aerial photograph **Figure 3**.
4. This statement considers the proposed removal of part of a state heritage place, the contemplated future building works; the existing fabric and setting conditions; the cultural heritage significance of the heritage place; and the nature of the proposed development's impact on the cultural heritage significance of St Mary's Anglican Church. Throughout this statement, where reference is made to "the proposal", it shall mean the scheme of design shown on the conceptual drawings<sup>1</sup> forming part of the application.
5. The proposal involves amalgamating the three lots, into two, with a small portion of the north-eastern corner of the property being subdivided and the heritage boundary altered to exclude this space. There, a freestanding digital advertising device is proposed. The purpose of the works is to generate revenue from leasing advertising signage, with the funds to be reinvested into conservation and modernisation works for the buildings on the parish grounds. As such, the proposed works will not affect the fabric of the place but may alter the setting, curtilage, and views to and from the site.
6. This statement has been prepared in accordance with principles set out in *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013* and *Practice Notes to the Burra Charter* and with the Department of Environment, Science and Innovation heritage guideline: *State Development Assessment Provisions: State Code 14: Queensland heritage*.
7. The application to remove parts of entries on the Queensland heritage register are made pursuant to s.36 of the *Queensland Heritage Act*.
8. An early Conservation Study<sup>2</sup> exist for the place and a Conservation Management Plan<sup>3</sup> (CMP) was developed in 2009. Record information, along with site inspections, have been used as the basis for this report's understanding of the existing place, the proposed removal of parts of entries on the QHR and the contemplated building work for an advertising device on this resultant lot.

### Cover Figure 01:

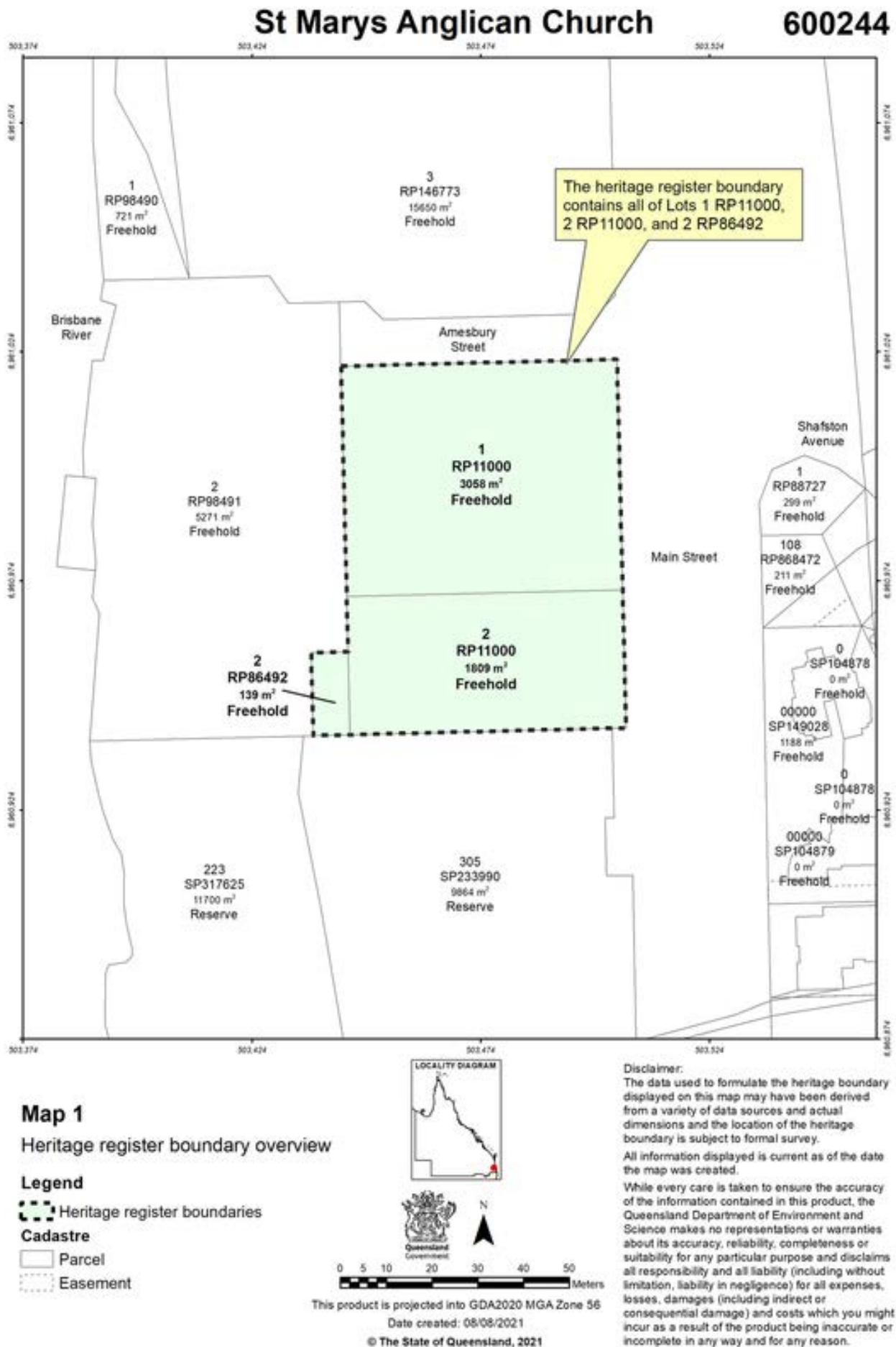
Recent photograph viewing towards of the St Mary's Parish grounds, and specifically the area of intervention by the contemplated works, as viewed from the pedestrian overpass which bridges Main Street.  
(Source: Pendergast Architects, Jan 2024)

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<sup>1</sup> Prepared by edrafting (rev 13 Feb 2025)

<sup>2</sup> Richard Allom Architects, St Mary's Church Kangaroo Point. A Conservation Study of the Anglican Church of St Mary the Virgin, Kangaroo Point, Brisbane, and its associated Rectory, Hall and Grounds. Report to the Parish of St Mary's, June 1985. Hereafter Allom Study, 1985.

<sup>3</sup> Riddel Architecture, St Mary's Kangaroo Point, Brisbane, Conservation Management Plan, June 2009. Hereafter Riddel CMP, 2009.



**Figure 2** Above: Heritage Boundary Map 1 - Entry 600244 - St Marys Anglican Church (2021)  
(Source: Queensland Heritage Register)



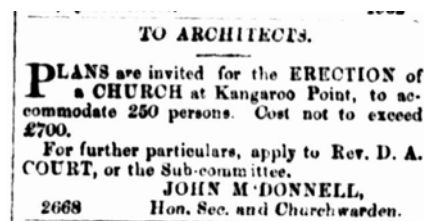


**Figure 3** Above: Contemporary aerial photograph of this part of Kangaroo Point, with St Mary's existing property boundaries shown in red dashed line. The location of the proposed advertising device is shown with a blue circle. Photo locations of figures within this report are annotated. (Source: City Plan 2014 Interactive Mapping)



## 2. BRIEF HISTORY OF THE PLACE

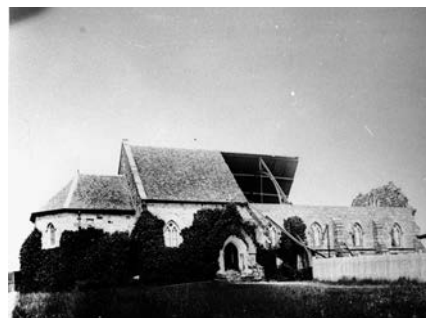
9. In September 1871, an advertisement was published in the Brisbane Courier seeking an architect to design a new church on this site, to replace an earlier timber church located on John Street (now Rotherham Street). Architect R.G. Suter was chosen to design a stone church with a budget “not to exceed £700”.<sup>4</sup> The church was consecrated 5th November, 1873.
10. What was originally built is similar in form to that which exists today, but without the south transept and vestry. The stone used was the local Brisbane porphyry which according to some reports came from the adjoining Kangaroo Point cliffs themselves.<sup>5</sup>
11. When the old church blew down in a storm in 1878, the land was sold to fund the building of the extant timber hall on the new site. The hall was opened on St Andrew's Day, 1879.<sup>6</sup>
12. The diocesan architect J.H. Buckeridge has claimed authorship of the rectory, constructed by 1889, between the church and parish hall.
13. A cyclone in 1892 destroyed half of the church roof and part of the western façade; however, it was swiftly rebuilt with added features, including the south transept, a lowered floor, and refined interior detailing, overseen by architect G.H.M Addison—all sympathetic to Suter's original design—and was rededicated by February 1893.<sup>7</sup>
14. All three buildings on the site remain largely as originally constructed, with the parish hall having undergone the most changes over time, partly due to its timber construction. A freestanding timber belfry was added around 1929 to the east of the church, and a stone and wrought iron arch was erected at the foot of the driveway in 1931.
15. The siting of St Mary's is most effective. The customary orientation of the chancel to the east means that access is through the north porch. Due to the site's commanding outlook, perched high above the Brisbane Rive, the churches west door faces the city across the river and forms a strong visual axis.
16. St Mary's has a historical link with the adjoining Navel Depot at the bottom of the cliffs to the west.<sup>8</sup>
17. The adjoining site to the south is parkland. There exists a metal palisade fence on the parkland's boundary to St Mary's, with no general access between the two sites.<sup>9</sup>
18. Amesbury street to the north of the site was cut down by 1923.
19. The opening of the Storey Bridge in 1940 brought with it associated roadway network changes. The junction of Main Street and Shafston Ave necessitated elevated concrete on ramps and road widening, which affected the means in which St Mary's is physically and visually connected with the community.
20. The vehicle entry gates at Main Street were widened in 2004, and the wrought iron archway taken down at that time.



**Figure 4 Above:**

Newspaper tender notice to architects for the erection of a new church, Brisbane Courier, 21 September 1871, p1.

(Source: Trove)



**Figure 5 Above:**

Historical photograph of St Mary's Anglican Church at Kangaroo Point, 1892, showing the place soon after the 1892 cyclone.

(Source: SLQ, FL28409)



**Figure 6 Above:**

Historical photograph “Early light reveals the bell tower of St Mary's Anglican church at the top of Kangaroo Point”, undated.

(Source: SLQ, FL55373)



**Figure 7 Above:**

Historical photograph of St. Mary's Church of England at Kangaroo Point, 1958.

(Source: SLQ, L. & D. Keen Pty Ltd FL1447901)

<sup>4</sup> <http://nla.gov.au/nla.news-page528441>

<sup>5</sup> Riddel CMP, 2009, p.10

<sup>6</sup> Allom Study, 1985, p.15

<sup>7</sup> Allom Study, 1985, p.19

<sup>8</sup> Naval Stores (former) (QHR#600239) were constructed between 1886 and 1888 to store and repair the first two government commissioned gunboats, the Gayundah and Paluma. Over time, the place was used for two main purposes, as a storage depot and for training. It was the first Naval base in Queensland. Wooden stairs, now derelict, provided access up the cliff to Amesbury Street and St Marys Church which has been the Naval Chapel for many years.

<sup>9</sup> The Kangaroo Point Girls School and the Kangaroo Point Infants School both opened in January 1890. They were amalgamated to become the Kangaroo Point State School in April 1950, which eventually closed in June 1965. The site was later home to the Southbank Institute of TAFE before being redeveloped into its current use as parkland in 2010.

### 3. THE EXISTING CONDITION

21. Access to the site is gained via a vehicle driveway from Main Street. Previous connections to the grounds from the south, west, and north have been removed. The driveway is carved into the cliffs and supported by a substantial stone retaining wall. Upon entry, it makes a sharp turn and ascends towards the north-eastern corner of the property before curving westward.
22. All three buildings have entrances facing the carpark. The site slopes consistently from south to north. The church, the largest of the three structures, occupies the highest position on the site, while the rectory and timber hall, more modest in scale, location, and detailing, are subordinate in comparison.
23. The church continues to be used for services, weddings and funerals.<sup>10</sup> The rectory is currently leased for residential accommodation. The hall continues to be used for parish events.
24. The Riddel CMP (2009) includes an appendix of priority works that are recommended to be actioned across the three building's and grounds.<sup>11</sup> Urgent work is also identified in the Allom Conservation Study (1985).<sup>12</sup> Much of what is scheduled is cyclical and/or preventative maintenance, however some actions are to arrest site specific issues. In the 15 years since the CMP and 40 years since the Conservation Study was made, much of the identified works remain incomplete.<sup>13</sup>
25. Due to an ageing parish and declining attendance numbers, the parish's revenue is also decreasing. With limited funding, long outstanding maintenance and upgrades to the buildings and grounds remain outstanding. Whilst the building's themselves are relatively robust, and so long as water and termites are kept away from the structure they remain intact, the quality of the spaces and access to them for parishioners is problematic.<sup>14</sup> This is a cycle of decline, as the facilities remain outdated, the visitation declines, which reduces the funding available to upgrade the facilities. The parish continues to actively applied for funding grants to action the list of works known for the buildings and grounds.<sup>15</sup>
26. The grounds include mature trees and gardens. The stone walls and cliff edges along Main and Amesbury Streets have fig trees which have seeded and ground from the cliff faces, much of this within the council verge beyond the property line, providing a thick canopy over the adjoining footpath and streets.
27. As the contemplated building work does not involve changes to the building's fabric, an assessment of the view lines to the place from Main Street and the impact of the contemplated advertising device is to be evaluated. **Figures 15 - 26** are contemporary photos of key view corridors to the heritage place from the surround streetscape; the locations of where these photos were taken from are indicated on **Figure 3**.



**Figure 8:** View of St Mary's Parish Hall from the east.

(Source: Author, Nov 2024)



**Figure 9:** View to St Mary's rectory from the north-east.

(Source: Author, Nov 2024)



**Figure 10:** View to St Mary's Church northern entry.

(Source: Author, Nov 2024)



**Figure 11:** View to the western facade of St Mary's Church which addresses the river.

(Source: Author, Nov 2024)

10 In 2024 there were 114 services held at St Mary's church that was attended by 5901 parishioners. In addition, there were 16 weddings, 47 baptisms, 6 confirmations and 24 funerals. The post-covid attendance remains constant, but far below pre-covid attendance levels.

11 Riddel CMP (2009), Appendix 8.4 SCHEDULE OF PRIORITY WORKS.

12 Allom, 1985, p. 58-63

13 Conservation and restoration works required for the church but remain incomplete due to lack of funding include repair of the interior floor, repair of the Lincoln organ, roof flashings, stone repointing, bell tower, windows and Sanctuary ceiling paintings. The Rectory requires maintenance to interior ceilings and cladding, repair of window shutters, all exterior doors, verandah decking and repainting of verandah railings. The Parish Hall's roof requires re-sheeting, interior asbestos lining removal, floorboard replacement and replacement of electrical fixtures.

14 Identified building works of this nature include providing equitable access to the hall, accessible and upgraded ablutions, fixing the asphalt car park, improve gardens and pathways, upgrade lighting in the church, install air conditioning in the church.

15 Since 2019, the parish has applied for a total of eight grants, of which they have been successful in six, enabling a total of approximately \$120k in grant funding to action urgent repair works across the site.





**Figure 12:** View from the eastern side of Main Street viewing north towards St Mary's, approx 150m from the contemplated advertising device. (Source: Author, Jan 2024)

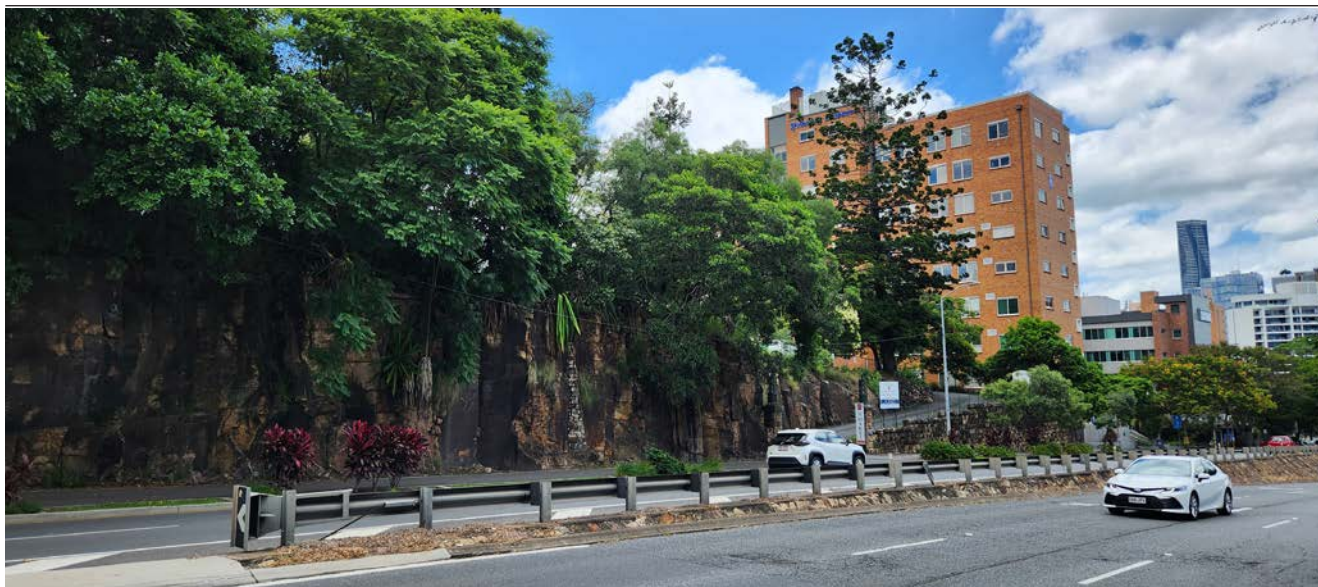


**Figure 13:** View from the eastern side of Main Street viewing north towards St Mary's, approx 100m from the contemplated advertising device. (Source: Author, Jan 2024)



**Figure 14:** View from the eastern side of Main Street viewing north towards St Mary's, approx 50m from the contemplated advertising device. (Source: Author, Jan 2024)





**Figure 15:** View from the eastern footpath adjoining Main Street towards St Mary's Anglican Church elevated site.  
(Source: Author, Aug 2024)



**Figure 16:** View from the eastern footpath adjoining Main Street, opposite the vehicle entry point to St Mary's Anglican Church.  
(Source: Author, Aug 2024)



**Figure 17:** View from the northern edge of the roadway which connects Shafston Road with Main Street's southern roadway, towards St Mary's Anglican Church. The roof of the rectory is visible from this vantage point.  
(Source: Author, Aug 2024)





**Figure 18:** View from the eastern edge of the pedestrian bridge viewing north.  
(Source: Jan, Aug 2024)

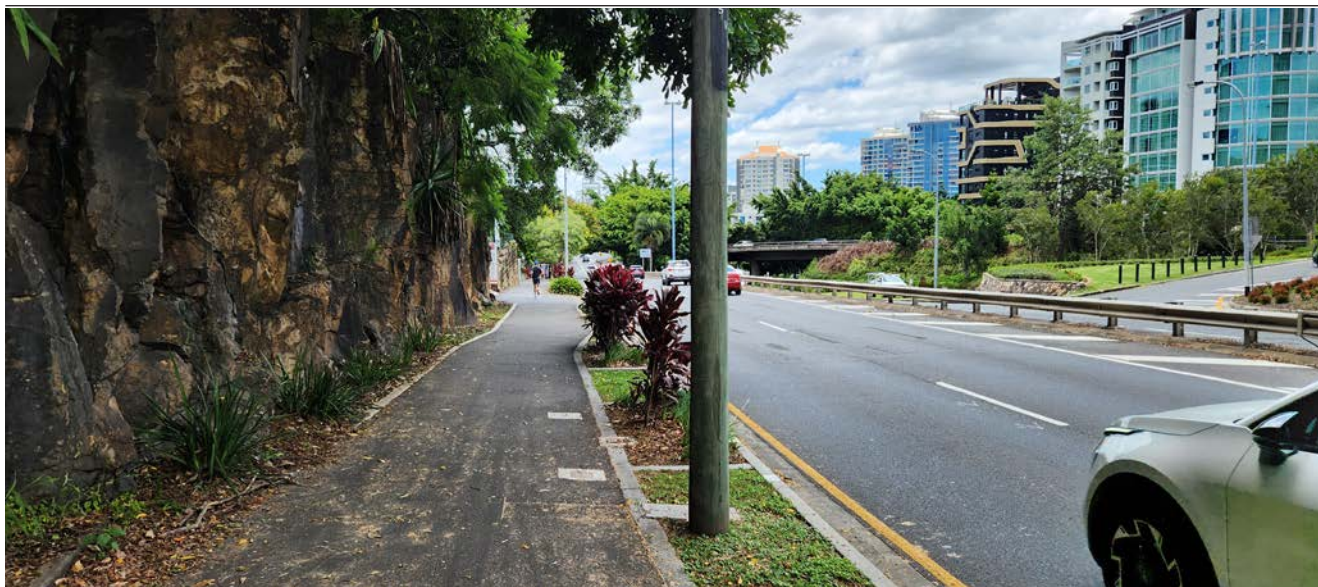


**Figure 19:** View from the centre of the pedestrian bridge viewing north.  
(Source: Author, Jan 2024)



**Figure 20:** View from the western edge of the pedestrian bridge viewing north. Glimpses of the Church vestry are visible through the overgrown fig trees which ground out from the side and top of the cliff.  
(Source: Author, Jan 2024)

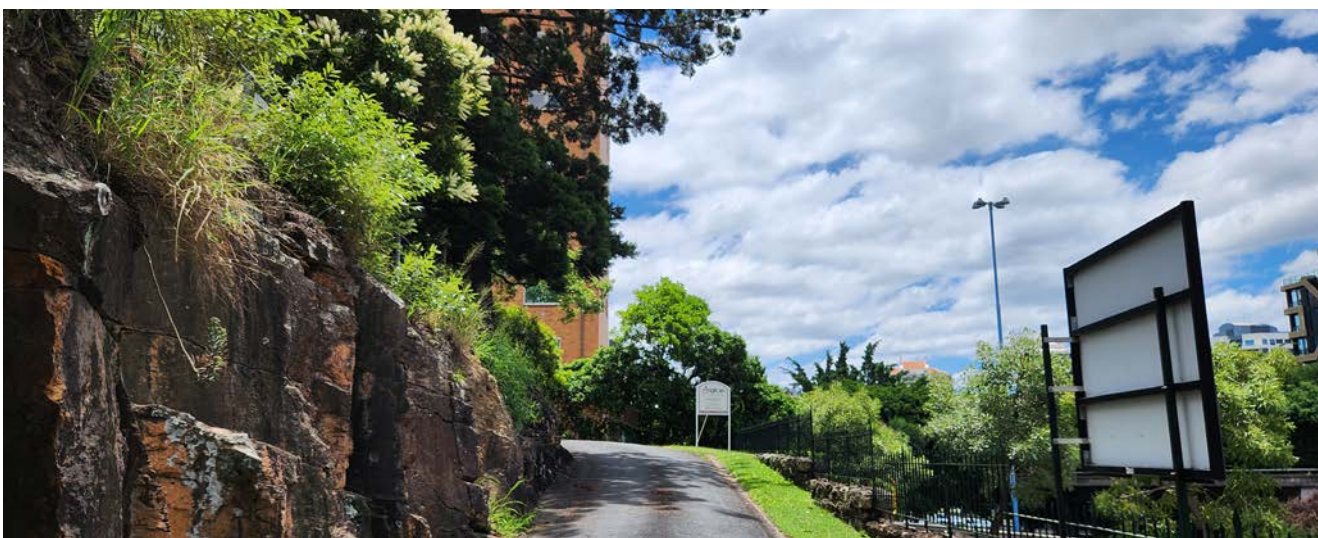




**Figure 21:** View north down Main Street from below the pedestrian bridge. St Mary's is above the cliffs on the LHS of image.  
(Source: Author, Jan 2024)



**Figure 22:** View north down Main Street in front of the vehicle entry to St Mary's Anglican Church precinct.  
(Source: Author, Jan 2024)



**Figure 23:** View north up the driveway towards the contemplated location of the advertising device.  
(Source: Author, Jan 2024)





**Figure 24:** Viewing south down Main Street standing in front of St Vincent Private Hospital. The closest structure to St Mary's is a 10-storey brick building with a zero setback to Amesbury Street.

(Source: Author, Jan 2024)



**Figure 25:** Viewing south along Main Street and east down Amesbury Street. The timber Parish hall is visible beyond the cliff.

(Source: Author, Jan 2024)



**Figure 26:** Viewing south along Main Street, towards the north-eastern corner of St Mary's allotment. Note the self seeded fig tree growing from the side of the cliff adjacent the contemplated location of the advertising device. Remnant stone blocks have been used to retain parts of the Amesbury St cut, however the quality to which that part of has been constructed, and that it has been constructed much later than the Main Street retaining wall indicate its significance is not equal to the Main Street retainer wall. (Source: Author, Jan 2024)



#### 4. CULTURAL HERITAGE SIGNIFICANCE

28. The Cultural heritage significance of St Mary's Anglican Church is well-established with the place being permanently entered in the Queensland heritage register.
29. The Statement of significance for St Mary's Anglican Church contained in the Queensland heritage register entry sets out the historical, architectural and aesthetic significance of the place and is adopted as the working statement of significance of this assessment. This statement sets out that:

- **St Marys Anglican Church is significant as having always been the naval chapel in Queensland. St Marys Anglican Church contains the oldest pipe organ in Queensland and the religious art of Godfrey Rivers.** (Criterion A)
- **St Marys Anglican Church is an early and intact religious precinct of church, hall and rectory and is one of the only two surviving stone churches designed by RG Suter.**  
(Criterion B)
- **St Marys Anglican Church is an early and intact religious precinct of church, hall and rectory and is one of the only two surviving stone churches designed by RG Suter.**  
(Criterion D)
- **The building remains as an historical and visual landmark in Kangaroo Point.** (Criterion E)
- **St Marys Anglican Church is significant as having always been the naval chapel in Queensland.** (Criterion G)
- **St Marys Anglican Church is an early and intact religious precinct of church, hall and rectory and is one of the only two surviving stone churches designed by RG Suter.**  
(Criterion H)

#### 5. PROPOSED DEVELOPMENT

30. The proposal involves realigning the property into two lots—one encompassing the majority of the heritage place, and the other comprising a small section in the north-eastern corner of the site. Then alter the heritage boundary to exclude the new, smaller lot, where a digital advertising device is proposed for construction.
31. Additionally, an easement is proposed that will encompass the vehicle entry driveway for access and services to the new lot.
32. The realignment of lot and annexation of the small area where the advertising device is proposed is necessitated by Council's *Advertising Devices Local Law 2021 Part 2, Div 1, 6(2)(b)(i)(B)* which states in part that advertising devices are prohibited *on land improved by a building that is a heritage place*. As such, the lot in which the advertising device is to be hosted cannot be within Council's heritage overlay.

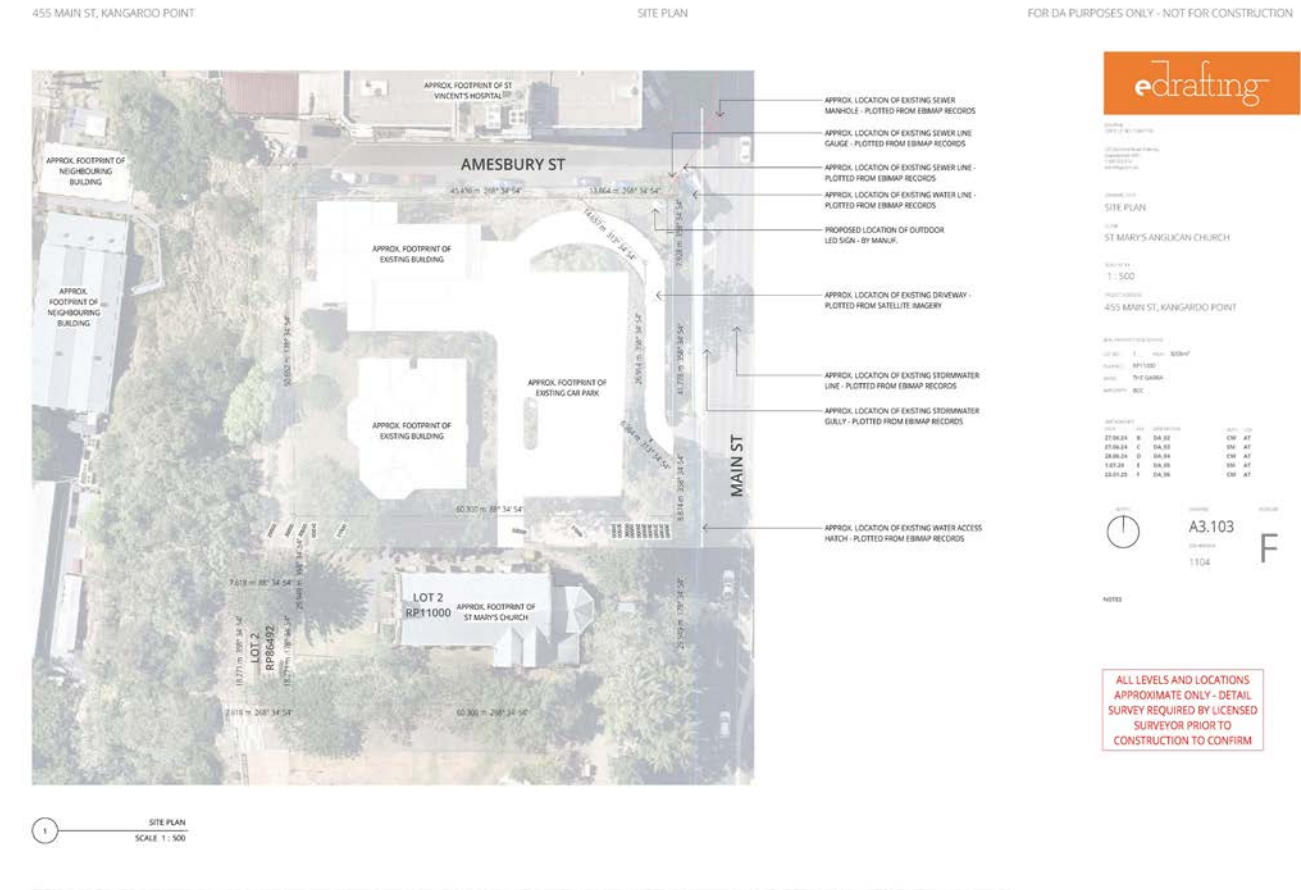


Figure 27: Proposed site plan showing the contemplated realignment of lot boundaries  
(Source: Site Plan, A3.103, eDrafting)

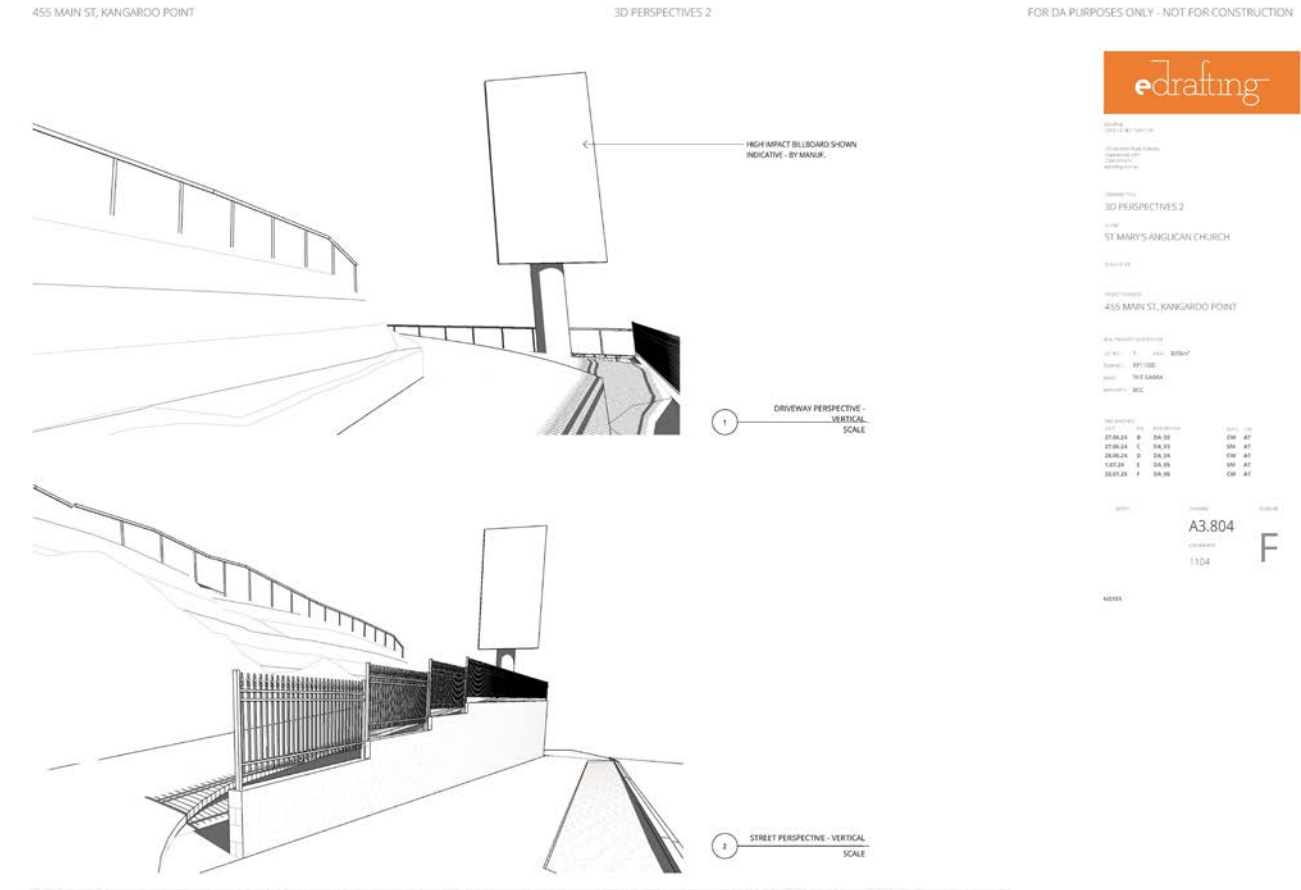


Figure 28: Proposed perspectives of a conceptual digital advertising device in the annexed lot.  
(Source: 3D Perspectives 2, A3.804, eDrafting)





**Figure 29:** Recent photograph of viewing north down the site from in front of the rectory. The advertising device would be visible from this vantage point, between the gum tree and pair of pine trees in centre of image.

(Source: Author, Dec 2024)



**Figure 30:** Photograph viewing east along the northern side boundary towards Main Street.

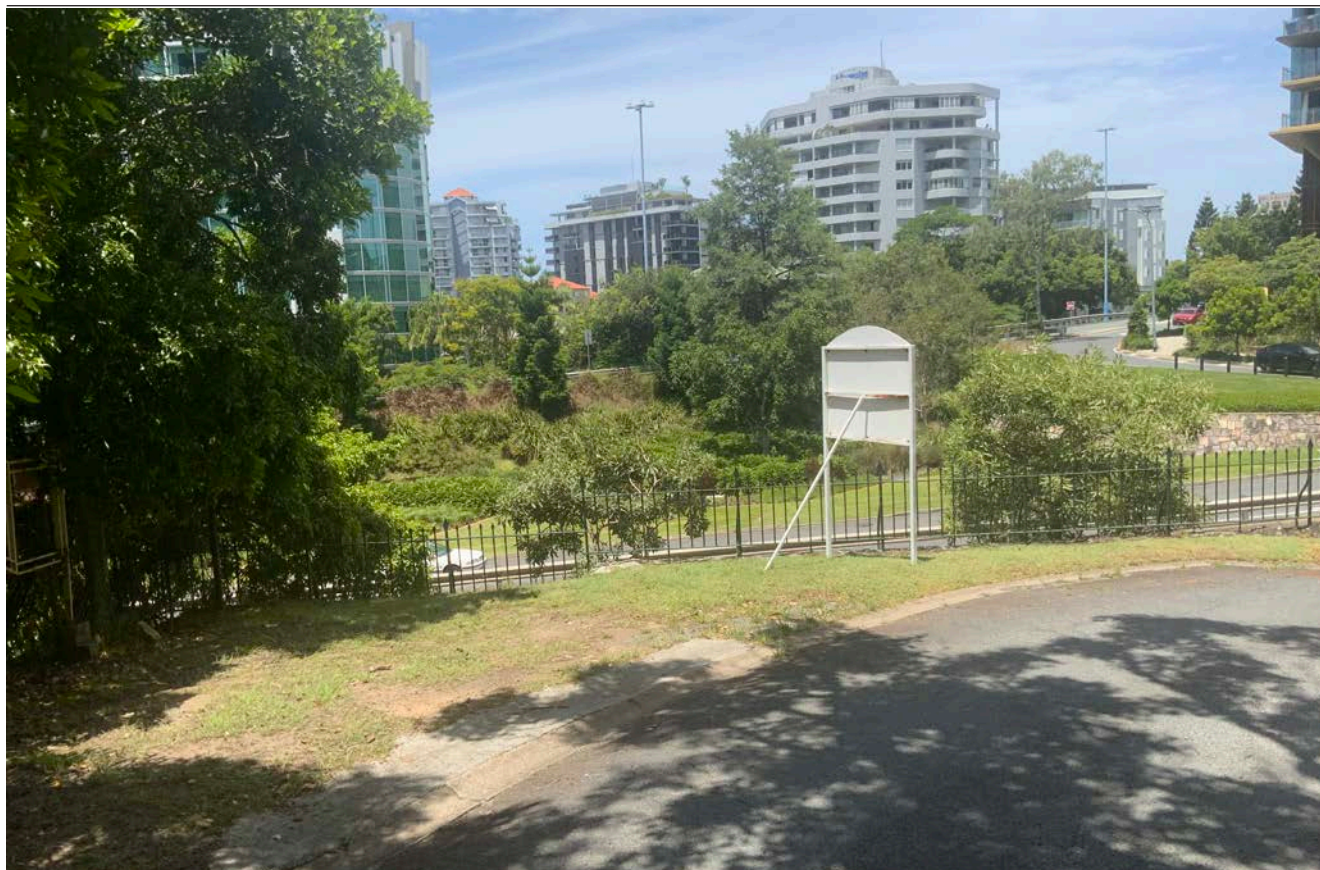
(Source: Author, Dec 2024)



**Figure 31:** Photograph viewing south towards the end of the Main Street Retaining wall adjoining Amesbury Street.

(Source: Author, Dec 2024)





**Figure 32:** Recent photograph of viewing east, towards Main Street and Shafston Ave junction beyond. The proposed advertising device will be located on this grassed area.

(Source: Author, Jan 2025)



**Figure 33:** Recent photograph of viewing north-east, towards Main Street and Shafston Ave junction beyond. The proposed advertising device will be located on this grassed area.

(Source: Author, Jan 2025)



## 6.0 THE CODE

33. *State Code 14: Queensland Heritage* provides the relevant assessment benchmarks for development on or adjoining a state heritage place. With regard to reconfiguring a lot on land containing a Queensland Heritage Place and the contemplated future development on land adjoining a Queensland heritage place the relevant Performance Outcomes for the assessment of the proposal are:

- ***PO5 Development does not result in a lot size or configuration which adversely impacts the aspects of the setting that form part of the cultural heritage significance of the Queensland heritage place.***
- ***PO6 Development does not result in a lot size and configuration which adversely impacts the ongoing conservation management of the Queensland heritage place.***

...

- ***PO8 Development is located, designed and scaled so that its form, bulk and proximity minimises adverse impacts on the cultural heritage significance of the Queensland heritage place.***

34. The resultant lot to host the advertising device would be adjoining a lot within the Heritage Overlay of the City Plan as a Local (and State) Heritage Place, therefore Heritage Overlay Code is relevant in the assessment of the proposal.

- ***PO16 Development including landscape and building elements does not impair the views of the heritage place.***
- ***PO17 Development for reconfiguring a lot does not result in a lot that has the potential to accommodate a building or structure that could further impair the visible attributes identified as significant in a heritage citation of the heritage place.***

## 7.0 DISCUSSION ON THE PROPOSED WORKS

35. St Mary's Anglican Church comprises an intact ecclesiastical precinct, incorporating the original church, rectory, and hall, all of which remain largely unaltered. The site occupies a visually prominent position when viewed from the city and affords a picturesque outlook across the Brisbane River towards the west.
36. The site has been affected by encroaching large-scale development to the north and east, as well as significant roadway modifications following the construction of the Story Bridge. These works resulted in the elevation of the Main Street and Shafston Avenue intersection, rendering the site an elevated enclave atop a rocky escarpment, surrounded by mature trees. St Mary's remains a significant but lesser-known vantage point for viewing Brisbane and the river.
37. The proposed reconfiguration of the lot does not give rise to immediate cultural heritage impacts. As there is no net reduction in the overall property boundary, the proposed amendment consists solely of an alternative delineation of internal lot boundaries, with no material impact on the integrity of the place.
38. The portion of land proposed for removal from the Queensland Heritage Register contains no built or natural fabric that contributes to the heritage significance of the site. The stone retaining wall forming the eastern boundary along Main Street will remain within the designated heritage boundary. The northern boundary to Amesbury Street is defined by a sheer cliff face, while the fence along this boundary is a low-height chain-link structure of no heritage significance. Accordingly, the proposed excision of this portion of land from the heritage listing will have no consequential impact on the heritage values of the site but is required to facilitate compliance with Council's *Advertising Devices Local Law 2021*.
39. The relevant heritage consideration in this matter pertains to whether the installation of a free-standing digital advertising device, in the proposed scale and location, would result in a material diminution of the cultural heritage significance of St Mary's Anglican Church.

## 7.1 ASSESSMENT AGAINST THE CMP POLICIES

40. The Riddel CMP (2009) has considered this matter, and stated at Policy 10: *Interpretation and Signage: Appropriate means of interpreting the place should be developed. Signage needs to be sufficient for the functioning of the church and other uses but should be kept to what is required and properly scaled and appropriately fixed. Advertising signage would not be appropriate on this site.*
41. This policy requires that appropriate means of interpreting the place be developed. Digital signage can serve as an effective interpretive tool by displaying historical information, promoting church events, and engaging the community with educational content. While the main function of the proposed digital sign is for commercial content to drive revenue, the sign is also intended to be used for advertising events at the parish and outreach of the parish's messaging to the local community. Curating content that provides rotating messages that highlight the church's historical and cultural significance, will ensure that interpretation of the place remains dynamic and responsive to contemporary audiences. The inclusion of such interpretative content



demonstrates compliance with the intent of the policy.

42. The policy acknowledges that signage should support the functioning of the church and other uses. In the present context, St Mary's is facing increasing financial pressures, and revenue from curated advertising will directly contribute to the ongoing maintenance and conservation of the precinct. Given that heritage conservation relies on sustainable management, digital signage with a carefully controlled advertising component will directly support the long-term viability of the parish community, its buildings and ground.
43. Contemporary communication methods, including digital signage, are widely used by religious and community organisations, and by parishes with growing congregations in particular, to remain relevant and accessible to their congregations and the public. The term "functioning" should therefore be interpreted in light of current needs and operational realities.
44. The policy states that advertising signage would not be appropriate on the site but does not define advertising signage. The proposed digital device would not solely be an advertising platform; rather, it would display a mix of church-related messaging, interpretative content, and third-party advertising. This distinction is critical, as the sign would not function as a purely commercial advertising structure but as a communication tool serving multiple purposes. Signage with a mixed-use function is distinct from purely commercial advertising and should be considered on its merits. The policy does not prohibit all forms of signage—only advertising signage—and the proposed use does not fall squarely within this restriction.
45. The proposal has been carefully sited to ensure it does not visually dominate or detract from the site's cultural heritage significance. The device is positioned the furthest distance from the church, appropriately scaled, and does not interfere with significant heritage fabric. With no physical impact on significant built elements, and given the reversible nature of digital signage, the proposal does not substantially diminish the cultural heritage significance of St Mary's. Allowing a measured, carefully considered approach to digital signage aligns with the long-term objective of conservation that seeks to balance heritage protection with functional viability.
46. The proposed digital signage aligns with the intent of the policy by supporting site interpretation, enhancing church operations, and ensuring financial sustainability. It does not constitute prohibited advertising signage but rather a multifunctional communication tool. On this basis, the CMP's Policy 10 should not be interpreted as an absolute interdiction against digital signage, but rather as a guideline to ensure appropriateness in scale, placement, and content. Accordingly, the proposed signage should be considered permissible under the policy.
47. As the proposed location will not affect any physical fabric of cultural heritage significance, but alter the setting of the place, the Riddel CMP (2009) has considered this matter also, in which Policy 18 states: *Conserving the setting: The setting of the precinct should be conserved including the major elements of the precinct (including the major buildings and other elements of significance such as the stone wall, main entry, drive, early fences and boundary lines, gardens, pathways) and their relationship including the hierarchy between the major elements; the*

*forecourt; sight lines within the site; arrival sequence from main entry...*

48. Also of relevance is Policy 26, which states: *Views Existing views to and from the site particularly to the west should be retained. If an opportunity arises in the future to re-instate sight lines (for example with the proposed park to the south) the opportunity should be taken.*
49. Once inside the church car park, the proposal will have no more than a minor impact on the setting of the place, with the character and atmosphere of the interstitial spaces between the church buildings remaining unaffected. The journey up the steep driveway will experience some change, as the digital signage will be positioned prominently in one's line of sight while driving or walking up the drive towards the north. Views out from the site in the direction of the proposal's location are insignificant to the place.
50. When travelling south along Main Street towards the site, either by vehicle or as a pedestrian on the western footpath, the proposal will partially obstruct views into the site. However, as the digital device will be oriented towards the south, its content will not be readily visible from this direction. The existing view in this direction already affords only partial glimpses of the buildings, which are largely obscured by the mature trees within the grounds, all of which are intended to be retained under the proposal.
51. Approaching the site from the south, either by vehicle or as a pedestrian on either side of Main Street, the digital signage will be clearly visible. This is a key objective of the proposal, enabling the device to be seen by passers-by as a means of displaying both commercial advertising and parish messaging to the community.
52. As the site is already elevated atop a rocky escarpment and set within a stand of mature trees, the overall setting from most vantage points will remain largely unchanged. While the steep driveway experience will be impacted, this must be balanced against the broader benefits to the long-term sustainability of the place, including increased revenue generation and enhanced communication with the community.
53. Many of the other policy statements contained in the Riddell CMP (2009) can be addressed using the revenue generated by the proposal. Engaging suitably qualified professionals, undertaking preventative maintenance, implementing compliance upgrades, and carrying out preservation, conservation and restoration works all require sufficient funding. The primary objective of the proposal is to generate revenue, both through commercial advertising and by increasing patronage, driven by the outreach messaging that the proposal will enable.

## 7.2 ASSESSMENT AGAINST THE BURRA CHARTER

54. Burra Charter Article 1.12 defines setting as *the immediate and extended environment of a place that is part of or contributes to its cultural significance and distinctive character*. The siting, being a hilltop location, perched on rock above cliffs on three sides, is a contributing element to the significance of St Mary's. The mature trees, building's and material quality of the place all further contribute to making the setting significant. Through the

introduction of the proposed advertising device, there will be no net reduction of elements of the place, simply the introduction of a very contemporary built element. This proposal will not reduce the *meaning* of the place, nor its *association*.

55. Article 3.2 states: *Changes to a place should not distort the physical or other evidence it provides, nor be based on conjecture*. While the proposal will result in a minor change to the setting and alter views of the site from the street, it will not otherwise impact the physical fabric of the place. The proposal has been carefully considered by the parish and diocese, who, as long-term custodians, view it as a positive addition that will support the parish through the revenue it generates and the outreach opportunities it facilitates.
56. Article 5.2 states: *Relative degrees of cultural significance may lead to different conservation actions at a place*. When assessing this proposal, the significance of views to the site from the street should be considered in relation to views from the city and, more importantly, the cultural significance of the church building itself. The minor impact on cultural significance resulting from the addition of the free-standing advertising device in the north-eastern corner of the site should be weighed against the broader benefits it will provide. The revenue generated by the device will support essential building works, maintenance, and conservation of the highly significant fabric across the rest of the site, which should be a key consideration in evaluating the overall impact of the proposal.
57. Article 8 which addresses setting states: *Conservation requires the retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place*. The proposal to remove a portion of the property from the heritage boundary is due to Council's *Advertising Devices Local Law 2021*. The overall site area will remain affected by the proposal. The mature plantings and siting of the key built fabric will again remain unchanged. The only alteration to the setting of the place will be the introduction of an advertising device along the northern boundary. Advertising devices are a prevalent feature throughout Brisbane's CBD, forming an established part of the city's urban backdrop. Given this context, the proposal is considered to maintain an approach to setting that is consistent with the principles outlined in this article.

### 7.3 ASSESSMENT AGAINST THE RELEVANT CODES

58. The relevant State Development Assessment Provisions (SDAP) for the proposal are related the change in lot size and that the new work is of an appropriate scale, form and proximity to the resultant adjoining heritage place so as not to adversely affect its cultural heritage significance.
59. The proposal achieves these performance outcomes as the resultant lot size will not enable any other conceivable form of development other than an advertising device. The property will remain in the ownership of the diocese, and its use will continue as it has for over 150 years.
60. The adverse impacts to the setting are minimised by its location on the far northern-eastern boundary. The river setting of the

place will remain unaltered. The bulk and scale of the proposed advertising device, which is proposed with a minimum of 30sqm digital face and in portrait format, is comparably to contemporary advertising devices nearby.

61. In regards to the relevant provisions of City Plan heritage overlay code, the views to the heritage place will not be impaired by the proposal. The principal impact of the device will be when traveling from the south along Main Street, and the view that will be obstructed is to the adjoining St Vincents building.

#### 7.4 ASSESSMENT OF PRELODGEEMENT ADVICE

62. It is acknowledged that during the course of the proposal's conception, the parish has met with relevant authorities at both Council and State levels of government. The minutes of these discussions have been reviewed during the course of preparing this impact assessment. The pre-lodgement advice was in no way dismissive of the proposal, and provided the project advice on the avenue for making the application for the development.
63. Key points from the advice minuted by the State Assessment and Referral Agency were:
- The principal views of significance supporting the church precinct's landmark status are from the western side of the river, looking back towards Kangaroo Point.
  - Views from Main Street and Shafston Avenue are of secondary importance, as the hall and rectory are oriented towards the river, but the church retains a visual presence from the east due to its elevated position, enhancing its landmark qualities in the surrounding urban area.
  - The position of the advertising sign at the northern end is expected to have minimal impact on the church's visual landmark qualities.
64. Key points from the advice received from Council were:
- Confirmation the proposed reconfiguration of lot is suitable
  - If SARA agrees with the ROL and the removal of the heritage overlay, it is likely that Council will follow suit.
  - If SARA supports the removal of the heritage overlay, it is recommended that a subsequent pre-lodgement meeting be held with Council's Heritage Unit to obtain their comments on removing the Local Heritage overlay.

## 8.0 HERITAGE IMPACT STATEMENT

65. Based on the assessment throughout this report, it is concluded that the proposed reconfiguration of lot and subsequent contemplated future development of an advertising device takes into account the conservation management plan for the place, principles of the Burra Charter and should have minimal and acceptable detrimental impact on the cultural heritage significance of St Mary's Anglican Church.

66. It is consequently concluded that the proposal:

- does not impact significant fabric
- does not impact the principal views, from the west, to the place
- does not impact the three church buildings, which will continue to be understood as a collective
- provides for the ongoing conservation of the place
- provides for the commercial viability and long-term sustainability of the parish
- maintains an acceptable distance from the significant buildings so as not to diminish substantially their curtilage nor setting
- obscures some views to parts of the church, rectory and parish hall from the north, however in such a way as to not substantially diminish the cultural heritage significance of the heritage place
- does not result in any diminishing of the defined cultural heritage significance as stated in the QHR statement of significance.

and conforms to all relevant criteria set out in *State Code 14: Queensland Heritage and City Plan*.

It is recommended that the proposal be viewed favourably by the Heritage Council and approved, subject to appropriate conditions, to ensure that the final design aligns with the conceptual plans and does not impact the nearby culturally significant fabric.



**Luke Pendergast**  
**Architect**  
**B.Arch FRAIA M.ICOMOS**

## APPENDIX

SDAP v3.0 State code 14: Queensland heritage	
Table 14.2: Development on a Queensland heritage place Performance Outcomes	
PO1 Development minimises adverse impacts on the cultural heritage significance of a Queensland heritage place.	Not Applicable
PO2 Development on a Queensland heritage place with identified archaeological potential manages adverse impacts on artefacts.	Not Applicable
PO3 Development employs methods and utilises materials that are compatible with the conservation of built and landscape features that form part of the cultural heritage significance of the Queensland heritage place.	Not Applicable
PO4 Development proposing to destroy or substantially reduce the cultural heritage significance of the Queensland heritage place must demonstrate that there is no reasonable alternative to the development that would conserve the cultural heritage significance of the Queensland heritage place.	Not Applicable
PO5 Development does not result in a lot size or configuration which adversely impacts the aspects of the setting that form part of the cultural heritage significance of the Queensland heritage place.	Refer Heritage Impact Statement Section 7.0
PO6 Development does not result in a lot size and configuration which adversely impacts the ongoing conservation management of the Queensland heritage place.	Refer Heritage Impact Statement Section 7.0
PO7 Development on a place where the relationship between built and open spaces form part of the cultural heritage significance of the place, maintains a lot size and configuration which facilitates the conservation of these relationships.	Not Applicable
PO8 Development is located, designed and scaled so that its form, bulk and proximity minimises adverse impacts on the cultural heritage significance of the Queensland heritage place.	Refer Heritage Impact Statement Section 7.0

## APPENDIX

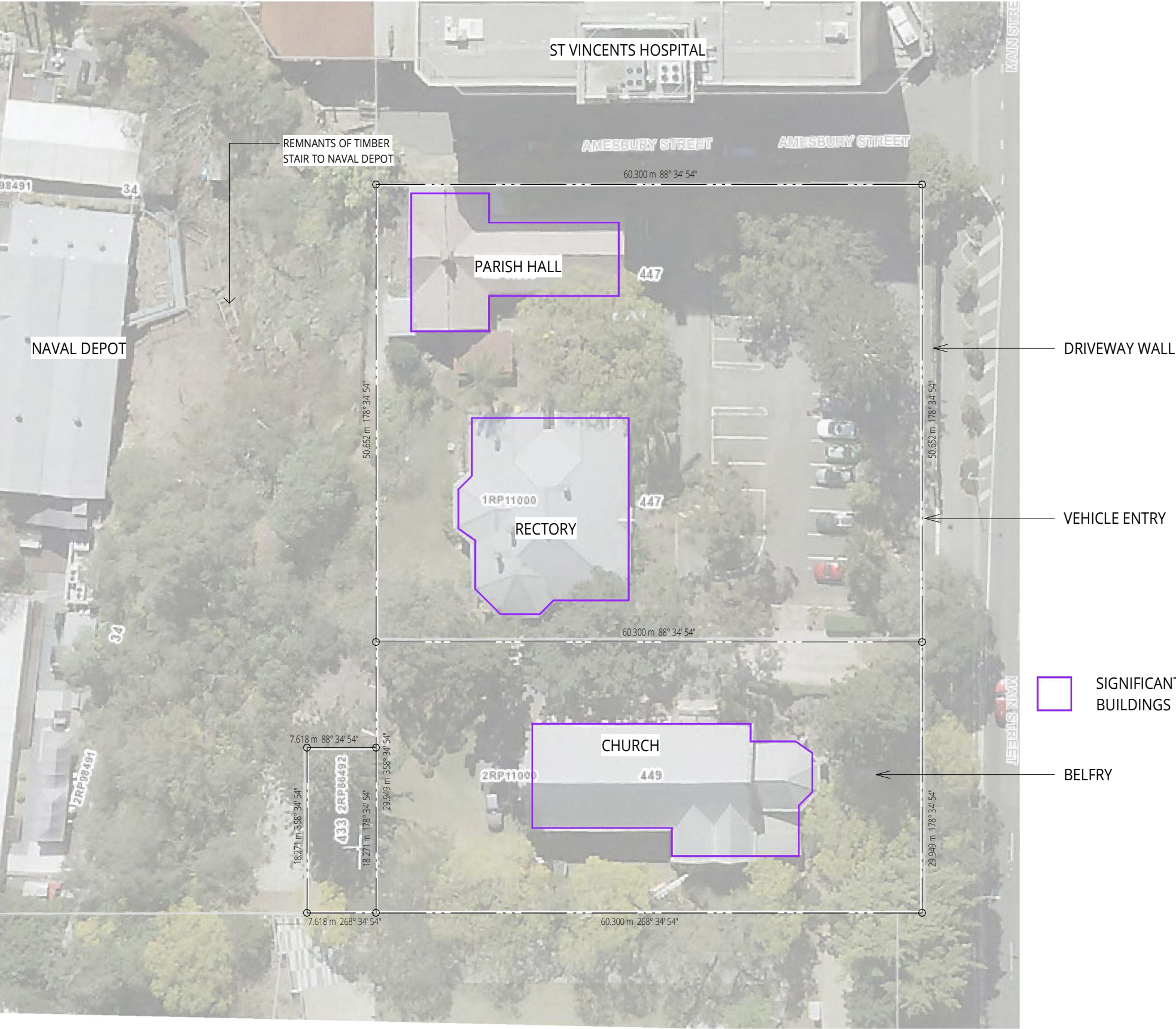
Brisbane City Plan 2014 (v.31) Part 8 Overlays 8.2 Overlay codes 8.2.12 Heritage overlay code	
Table 8.2.12.3—Performance outcomes and acceptable outcomes Section B—If in the Area adjoining heritage sub-category	
<b>PO16</b> Development including landscape and building elements does not impair the views of the heritage place. Note—Where necessary, a heritage impact assessment report is prepared containing a heritage impact statement that analyses the impact of the proposal.	Refer Heritage Impact Statement Section 7.0
<b>PO17</b> Development for reconfiguring a lot does not result in a lot that has the potential to accommodate a building or structure that could further impair the visible attributes identified as significant in a heritage citation of the heritage place. Note—Where necessary, a heritage impact assessment report is prepared containing a heritage impact statement that analyses the impact of the proposal.	Refer Heritage Impact Statement Section 7.0



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This report has been prepared by Pendergast Architects Pty Ltd for the project owners and may only be used and relied upon by the project owners for the specific purpose agreed between Pendergast Architects Pty Ltd and the project owners. The document may not contain sufficient information for any purposes outside of the Agreed Purpose. The opinions, conclusions, recommendations and information included in the document are limited to the scope of the relevant engagement and based on the knowledge and approach, and the conditions encountered and information reviewed, as at the date of preparation of the document. This report does not permit works to commence without formal authority approval of the described works herein.





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DRAWING TITLE  
AERIAL PLAN A  
  
CLIENT  
ST MARY'S ANGLICAN CHURCH

SCALE AT A3  
1 : 500  
  
PROJECT ADDRESS  
455 MAIN ST, KANGAROO POINT

REAL PROPERTY DESCRIPTION  
  
LOT NO.: 1 AREA: 3058m²  
PLAN NO.: RP11000  
WARD: THE GABBA  
AUTHORITY: BCC

AMENDMENTS			AUTH	LDR
DATE	REV	DESCRIPTION		
27.06.24	C	DA_03	SM	AT
28.06.24	D	DA_04	CW	AT
1.07.24	E	DA_05	SM	AT
23.01.25	F	DA_06	CW	AT
25.03.25	G	DA_07	CW	AT
28.03.25	H	DA_08	CW	AT

NORTH

DRAWING

A3.104

JOB NUMBER

1104

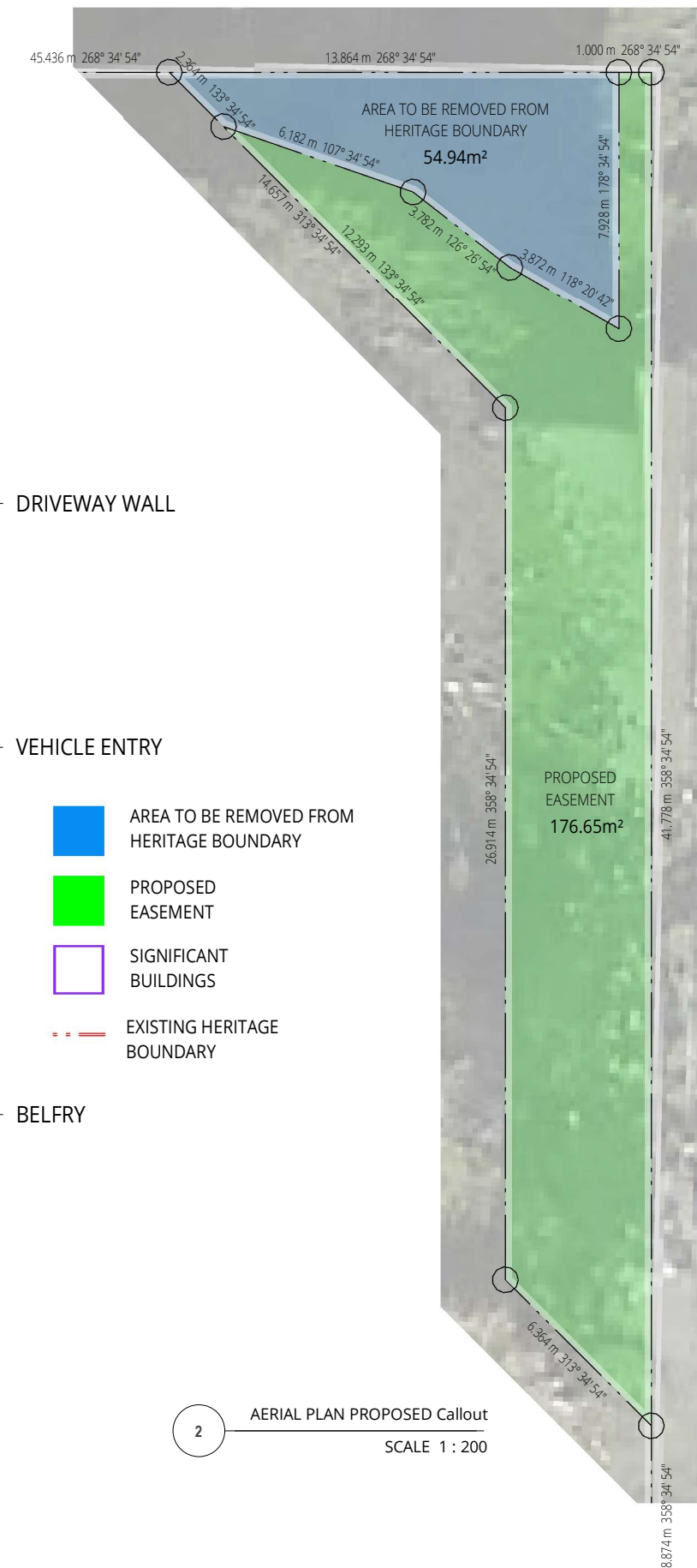
REVISION

H

NOTES

ALL LEVELS AND LOCATIONS  
APPROXIMATE ONLY - DETAIL  
SURVEY REQUIRED BY LICENSED  
SURVEYOR PRIOR TO  
CONSTRUCTION TO CONFIRM





ALL LEVELS AND LOCATIONS  
APPROXIMATE ONLY - DETAIL  
SURVEY REQUIRED BY LICENSED  
SURVEYOR PRIOR TO  
CONSTRUCTION TO CONFIRM



SARA reference: 2408-41836 SPL

11 September 2024

St Mary's Anglican Church C/- Rev. Richard James  
C/- Urbicus Pty Ltd



**Attention: Mark Kierpal**

Dear Mark,

## **SARA Pre-lodgement advice – St Mary's Church - 447 Main Street, Kangaroo Point**

I refer to the pre-lodgement meeting held on 5 September 2024 in which you sought 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 applicant seeks to establish a high impact electronic display sign (billboard) with approximate dimensions of 8 metres x 4 metres on the site at 447 Main Street, Kangaroo Point. To facilitate the billboard, a 3 into 2 lot subdivision is proposed over the site. This would involve excising an allotment in the north-eastern corner of the site. The total area of this lot is to be determined. Additionally, an easement would be included for access and services (such as electricity) and a balance lot would be created which includes all existing heritage buildings and vegetation.

SARA understands the premise behind the proposal is to provide an income stream for the church as there is significant upkeep required on the various buildings on site and the church has limited access to funding for such works.

The proposed billboard is to be located in the north-eastern corner of the site and the applicant's logic behind erecting the sign in this location is based on following:

- o it is the furthestmost point away from the heritage buildings on site
- o it is considered that the sign will not impact the heritage buildings

- o visually the sign has limited, if any, impacts on the heritage buildings due to the separation distances
- o the lot being created for the sign does not require services such as sewer and water
- o access is to be facilitated via an easement
- o the sign would be located on the boundary (or close to) of the proposed allotment.

Brisbane City Council (the Council) has a Local Law that prohibits signage on land within the Heritage Overlay (both Local and State). As a result, to enable the opportunity to lodge a Permitted Advertising Device with the Council and SARA, the portion of the site to host the signage cannot be within the Heritage Overlay.

The applicant believes the following steps will facilitate the erection of signage on the site:

1. excising the proposed north-eastern allotment
2. removing the Heritage Overlay over the proposed north-eastern allotment to allow for a Permitted Advertising Device.

Advice from SARA was sought in relation to the following:

- suitability of the proposed subdivision
- support to excise the subject allotment for signage/infrastructure purposes
- removal/lifting of the State Heritage Overlay for subsequent excised allotment
- report requirements for the proposed application.

### Supporting information

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

Drawing/report title	Prepared by	Date
URB24-075 447 Main Street, Kangaroo Point - Prelodgement Letter – SARA	Urbicus Pty Ltd	9 August 2024
Appendix B - St Marys Anglican Church State Heritage Citation	Queensland Government	20 February 2022
Appendix C - advertising_devices_local_law_2021	Brisbane City Council	21 May 2021
Appendix D -Advertising Devices Design and Assessment Rule (6) (1)	Brisbane City Council	Undated
BCC Prelodgement Meeting Minutes	Brisbane City Council	8 August 2024
1104_StMarysChurch_DA_05	eDrafting	1 July 2024

### Pre-lodgement meeting record

Meeting date	5 September 2024
Meeting location	MS Teams
Meeting chair	Nikki Brock
Meeting attendees	Refer to Attachment 1



## Pre-lodgement advice

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

<b>Queensland Heritage Register (QHR) boundary amendment</b>	
1.	<ul style="list-style-type: none"> <li>This is a lengthy process and there is no guarantee of success. A response should not be expected within 6 months.</li> <li>Applications to remove parts of entries on the QHR are made under s.36 of the <i>Queensland Heritage Act 1992</i>. All aspects of the QHR entry will be open for review including the statements of significance.</li> <li>The application would need to demonstrate why the area proposed for excision does not satisfy each of the relevant cultural heritage criteria for the place.</li> <li>Details on all the existing features in the area would need to be identified (e.g. trees, stone walls, fencing) in any part removal application.</li> <li>All applications seeking to remove part of a place from the QHR boundary, require approval of the Queensland Heritage Council.</li> <li>A request to remove part of the QHR boundary to facilitate approval under the Council's Advertising Devices Local Law is unlikely to be supported.</li> </ul> <p>Please contact the Heritage Register team to discuss the QHR boundary proposal:</p> <ul style="list-style-type: none"> <li>Officer – Anthony Grech, A/Principal Heritage Officer</li> <li>Email – <a href="mailto:heritage@des.qld.gov.au">heritage@des.qld.gov.au</a></li> </ul> <p>It is suggested that correspondence be sent to the team to outline the proposal and a subsequent meeting be sought.</p>
<b>Reconfiguring a Lot (RAL)</b>	
2.	<ul style="list-style-type: none"> <li>Consideration of the RAL proposal is based on the current QHR boundary.</li> <li>Performance Outcomes (PO)5 and PO6 of State code 14: <i>Queensland heritage</i> of the State Development Assessment Provisions (SDAP) are relevant.</li> <li>The proposed reconfiguration to rearrange the boundaries of the church property to excise a discrete triangular parcel in the north- eastern corner, and amalgamate the two largest parcels into a single lot is considered to satisfy State code 14 because: <ul style="list-style-type: none"> <li>the vast majority of the place's setting will be contained within one ownership/lot, improving the ability to manage intrusive development on the place</li> <li>containing the place's three important buildings and grounds in a single lot will help to conserve the place's heritage value as a religious precinct of note</li> <li>access into the place will not be fragmented but instead protected with an easement granted in favour of the triangular parcel in the north-east corner.</li> </ul> </li> </ul>
<b>Advertising device</b>	
3.	<ul style="list-style-type: none"> <li>Assessment is based on the current QHR boundary.</li> <li>The principal views of significance supporting the landmark status of the church precinct are obtained from the western side of the river, looking back towards Kangaroo Point.</li> <li>Views to the place from Main Street and Shafston Avenue are considered to have secondary importance as the hall and rectory are oriented closer to the river than Main Street, but the church building still has a visual presence (from the east) being positioned on the highest part of the site improving its landmark qualities to the surrounding urban area.</li> <li>The position of the advertising sign at the northern end is expected to have little impact on the visual landmark qualities of the church building.</li> <li>The sign will have some impact on views of the rectory and hall, however, criterion E of the QHR entry appears to reference a singular building (i.e.. the church) so this impact is not considered significant</li> <li>Under criterion D of the QHR entry, the church precinct is of cultural heritage significance.</li> </ul>

	Excavations and footings for the billboard will need to protect the adjacent tuff wall from being damaged. Supporting evidence from a structural engineer with experience in dealing with heritage structures will be required.
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This advice outlines aspects of the proposed development that are relevant to SARA's jurisdiction.

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.

The advice in this letter 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 after a formal application has been lodged.

For further information please contact Nikki Brock, Principal Planner, on 3452 7680 or via email [BrisbaneSARA@dsdilgp.qld.gov.au](mailto:BrisbaneSARA@dsdilgp.qld.gov.au) who will be pleased to assist.

Yours sincerely



Mica Cook  
Principal Planner

enc      Attachment 1 – Pre-lodgement meeting attendance record

## Attachment 1 — Pre-lodgement meeting attendance record

### Meeting attendees:

Name	Organisation
Mark Kierpal	Urbicus Pty Ltd
Rev. Richard James	St Mary's Anglican Church
Darrian Borick	Department of Environment, Science and Innovation – Heritage (DESI)
Jamie Faithfull	DESI
Sallie Battist	Department of Housing, Local Government, Planning and Public Works (DHLGPPW)
Nikki Brock	DHLGPPW