

Date : 12/01/2022 2:50:49 PM

From : "Benjamin Carson"

To : "Sarah Foley"

Subject : 202112-16010 EC - (QHR600189) - IR [DELEGATE APPROVAL]

Attachment : Mowbray park draft plan.jpg; Attachment 4 - Heritage Impact Assessment.pdf; Attachment 2- Proposal Plans.pdf; EDOCS - 16267614 - 202112-16010\_EC\_(QHR600189)\_ - Information\_Request - \_1.DOCX.DRF; image001.png; image003.png; image004.png;

Hi Sarah,

This IR and accompanying letter is approved for issue with the changes set out below. I have made similar changes to the IR notice.

Kind regards,  
Ben

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From: Sarah Foley <Sarah.Foley@des.qld.gov.au>

Sent: Monday, 10 January 2022 2:24 PM

To: Benjamin Carson

Subject: Due 12 Jan - 202112-16010 EC (QHR600189) - DELEGATE APPROVAL - IR due 12-Jan-2022

Hi Ben,

Application 202112-16010 EC for the Building Work - demolition of former East Brisbane Bowls Club Building and outbuildings at Mowbray Park and East Brisbane War Memorial (QHR 600189) for your review and approval to issue. HIS and the proposal plans are attached. My draft response to the applicant is below for your approval to issue. The screenshot of the Mowbray Park draft plan is attached to send with the response to the applicant.

Regards, Sarah.

IR date is 12-Jan-2022.

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Brisbane City Council - City Projects Office

Section 78B(2) Senior Urban Planner

[bi-cpo-planenv@brisbane.qld.gov.au](mailto:bi-cpo-planenv@brisbane.qld.gov.au)

Section 78B(2)@brisbane.qld.gov.au

Dear Section

**Heritage Protection of State Heritage-Listed Mowbray Park, East Brisbane.**

**With the information currently available for assessment, your this exemption certificate application has been declined will not be approved and a refusal notice will be issued, or alternatively the application could be withdrawn. without further supporting information.**

The works of removal of the bowls club buildings would be result in more than minimal detrimental impact on the cultural heritage significance of the State heritage place because the removal of the bowls club buildings renders the recreational use of the bowling green defunct as a recreational activity provided at the place. Without signalling a replacement use for the this aspect of the site, which is deemed to be of critical recreational importance, the lack of clarity of regarding the future use of the area and that this is these future changes are not addressed in the application shows that this is not the appropriate assessment pathway. This is because without indication of a future use, DES Heritage is unable to determine if this change is of minimal detrimental impact to the State heritage place.

**With regard to the Queensland heritage register entry:**

- 'Mowbray Park and East Brisbane War Memorial' (Mowbray Park) was entered in the Queensland Heritage Register (QHR) when the *Queensland Heritage Act 1992* came into force. The QHR listing covers three large freehold lots on the Brisbane River at East Brisbane and includes a former bowls club building and the bowls greens.
- The former bowls club building was constructed in the 1970s and the QHR entry identifies that it and the buildings themselves are not significant by stating: the "bowls and nearby croquet club building are not of cultural heritage significance".
- The area of Mowbray Park occupied by the former bowls club, however, is integral to the park, as evidence of an early and long-standing form of recreation available to the local community – at the time of entry on the Queensland heritage register this included recreation that required the amenity of an indoor space.

The history component of the QHR entry notes, "in a report presented to the full Council on 14 December 1903, the advantages of the site for a public park were enumerated: Mowbray's property is in every way suitable for a public Park or garden having suitable soil, and undulating land reaching to the water's edge, and in addition it will also provide the necessary accommodation for **bowling greens, Tennis Courts, and Croquet lawns.**"

- The QHR entry recognises the high "importance of the park as a focus of community recreation". The History element of the QHR entry states "the whole park reserve is significant."
- The current exemption certificate application addresses that the buildings themselves are not of particular heritage significance however the application does not signal the future use of the area of the bowling green or the provision of new interior recreation space to replace the amenity lost by demolition of the bowls club.
- Readily available online published 'draft vision' shows a rendering of a carpark replacing the bowling green and text notes the 'carpark

shifted to bowls green to allow more active riverfront green space.” (Source image appended)

- This replacement of bowls green with carpark indicates that the change is of more than minimal detrimental impact to the State heritage place.

This information request requires further detail to be supplied showing the proposal for the bowls club to ensure the continuity of recreational use.

The applicant is advised that there are two ways to proceed,

1. If it is decided to continue with the piecemeal application of exemption certificate for removal of the bowls club buildings, BCC would need to provide a **legitimate satisfactory** Information Request response **to demonstrate that the development will result in at most minimal detrimental impact on the place’s cultural heritage significance**. The masterplan of the Mowbray park proposal, **addressing the continuity of the recreational use of the site** would need to be **addressed-supplied** as part of the application / **information request response**. BCC would need to show how an equivalent and similar type of structured recreational activity is provided at the place. ~~This would particularly need to~~ and the HIS needs to address Criteria G&H of the Statement of significance of the QHR entry.

or

2. withdraw the Exemption certificate application and make a Development Approval ~~response~~ application to SARA as assessment manager. Demolition of the former bowls club building and its two bowling greens and associated outbuildings can be applied for as a development approval under the Planning Act 2016. The State Assessment and Referral Agency would be the assessment manager and the ‘State Development Assessment Provisions’ the applicable assessment benchmark, in particular ‘State code 14: Queensland heritage.’



**Sarah Foley**  
Principal Heritage Officer  
Architect  
Heritage: Environment Policy and Programs  
Department of Environment and Science

---

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Environmental Policy and Programs acknowledges the Traditional Owners and Custodians of the lands, waters and seas on which we work and live paying respects to Elders, past, present and future.

**Please note:** In keeping with the Government’s requirements, Heritage branch staff are operating remotely. For us, it is business as usual. However, to best channel your enquiry, we can be contacted by email through the contacts below. If you would like us to give you a call, please indicate this in your email. We ask for your patience as we work through these arrangements.

- For enquiries about the Queensland Heritage Register: [heritage@des.qld.gov.au](mailto:heritage@des.qld.gov.au)
- To contact the Queensland Heritage Council: [heritage.council@des.qld.gov.au](mailto:heritage.council@des.qld.gov.au)
- Report damage to Queensland Heritage Register places : [pollutionhotline@des.qld.gov.au](mailto:pollutionhotline@des.qld.gov.au)
- For enquiries about getting approval to do development at a Queensland heritage place: [palm@des.qld.gov.au](mailto:palm@des.qld.gov.au)
- For enquires about terrestrial archaeology and underwater cultural heritage like historic shipwrecks: [archaeology@des.qld.gov.au](mailto:archaeology@des.qld.gov.au)





# Mowbray Park Early Works



Proposed demolition of former East Brisbane  
Bowls Club building

Heritage Impact Assessment Report

For Application for Exemption Certificate Approval

Prepared by City Projects Office,  
Brisbane City Council

Version	Prepared by:	Reviewed by:	Authorised for issue:	Issued date:
A	Section 78B Experienced Landscape Architect - Heritage	Section 78B(2)(c)	Section 78B(2)(c)	17.11.2021
B	Section 78B(2) Experienced Landscape Architect - Heritage	Section 78B(2)(c)	Section 78B(2)(c)	07.12.2021
C	Section 78B(2) Experienced Landscape Architect - Heritage	Section 78B(2)(c)	Section 78B(2)(c) sch4p4(6) Personal informati	20.12.2021

Published on DES Disclosure Log  
RTI Act 2009

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## 1.0 Introduction

### 1.1 Context

#### 1.1.1 Background

This report was commissioned by Natural Environment, Water & Sustainability (Brisbane City Council), to support an application to the Department of Environment and Heritage Protection for exemption certificate approval for the proposed demolition of the former East Brisbane Bowls Club building and outbuildings located in Mowbray Park, East Brisbane.

Mowbray Park is included in the Queensland Heritage Register as **Mowbray Park and East Brisbane War Memorial – (QHR 600189)**.

The proposed works have stemmed from a vision developed by Council for Mowbray Park and, following on from that, a concept plan that identifies improvements to the park that respects the heritage values of the park.

#### 1.1.2 Conservation approach

This report has been prepared in accordance with the principles of the Australia ICOMOS Burra Charter, 2013 – the nationally accepted best practice approach for managing places of cultural heritage significance in Australia.

Brisbane City Council completed a draft conservation management plan (CMP) for Mowbray Park in 2017 which built on the 1995 *Mowbray Park: Conservation Plan* prepared by Allom Lovell Marquis-Kyle. This assessment draws on the information contained in the draft 2017 CMP as well as the information contained in the Queensland Heritage Register for Mowbray Park.

#### 1.1.3 Site

The proposed works affect the former East Brisbane Bowls Club building and associated outbuildings, which are located in Mowbray Park, East Brisbane, along the Lytton Road edge of the park.



Figure 1 Location Plan.

## 2.0 Outline of proposed works

### 2.1 Proposed works

Brisbane City Council is proposing to demolish the former East Brisbane Bowling Club building and two small outbuildings, make good the footprint of the building pending final plans. In summary, it will involve:

- Undertaking a detailed assessment of the building to identify any contaminants or risks.
- Preparing a safe work method statement.
- Engaging an arborist to advise on tree protection measures required for nearby trees.
- Manually demolishing the buildings, recycling any material where appropriate.
- Removing any debris, rubbish.
- Filling any holes, grading the site to ensure a smooth grade with no trip hazards.
- Managing erosion and sediment control.
- Installing a layer of mulch across the footprint of the building and new fencing as required to ensure safety.

A further application will be submitted detailing the final proposed works once the design has been sufficiently progressed (expected to be in 2022).



## 2.2 Purpose of the works

Brisbane City Council is proposing to demolish the former East Brisbane Bowling Club building and outbuildings due to its current condition and its poor design/orientation in the context of the rest of the park. These are discussed below.

### 2.2.1 Condition

The former East Brisbane Bowling Club building was built in the mid-1970s and is now no longer fit for purpose and would require substantial investment to upgrade for long term use.

### 2.2.2 Design

The current location and orientation of the former East Brisbane Bowling Club building was determined by the 1970s widening of Lytton Road which resulted in the original building being removed. The current building served its purpose as the bowling club clubhouse well with its orientation overlooking the greens. However, with the club no longer operating and the greens no longer used for bowling, the building has now been repurposed as a community building. The building does not sit well within the broader park context. Its orientation and level means that it is somewhat isolated from the rest of the park.

### 2.2.3 Green space

There is a general desire for increased green open space within inner city locations like this that are facing competing land use demands.

Brisbane City Council developed a draft concept plan for Mowbray Park which was informed through consultation with the local community between December 2020 and February 2021. The desire for increased green open space was a key finding of the consultation. The draft concept plan proposes the removal of the former East Brisbane Bowling Club building and retention of the bowling greens as green open space. Council is currently progressing the concept plan.

## 3.0 Photos of the site



**Figure 2.** Western elevation of former East Brisbane Bowling Club building fronting the bowling green – the front of the building.



**Figure 3.** North Western corner.



**Figure 4.** South Western corner near Lytton Road.



**Figure 5.** North Eastern corner of building showing the undercover area.



**Figure 6.** Northern side of building.



**Figure 7.** Rear of building showing informal vehicular access from Lytton Road.



**Figure 8.** South Eastern corner of building showing ramp access to rear of building.



**Figure 9.** Southern side of smaller associated outbuilding.



**Figure 10.** Eastern side of smaller associated outbuilding.



**Figure 11.** Western side of smaller associated outbuilding.



**Figure 12.** Eastern side of larger associated outbuilding.



**Figure 13.** Southern side of larger associated outbuilding.



**Figure 14.** Northern side of larger associated outbuilding.

## 4.0 Understanding the significance of the place

### 4.1 Description

#### Place Details

The proposed works are located within the State Heritage Place - **Mowbray Park and East Brisbane War Memorial – (QHR 600189)**.

#### Physical Description – Former East Brisbane Bowling Club building and outbuildings

The former East Brisbane Bowling Club building was built in the mid-1970s when the original pavilion was demolished to accommodate the 1970s Lytton Road widening. The building is a single level brick building on concrete piers approximately 40m long and 18m wide. There is a ramp off Lytton Road providing pedestrian access to the building and stairs on the northern side of the building providing access to the park. A steep gravel driveway provides access for vehicles from Lytton Road to underneath the building which has been used as an informal car park. It has a very low-pitched corrugated iron roof and windows that run the length of the western side of the building overlooking the former green.

The building is no longer used for its original intended purpose, which was club house for the East Brisbane Bowling Club. Backbone Youth Arts have been the community facility tenant for the past four years; however, they are relocating to a purpose-built performance arts facility in early 2022.

The two outbuildings appear to have been built at the same time as the clubhouse and are built with similar materials. They are both single story brick buildings with flat roofs. The

larger building is approximately 12m long x 6m wide and may have been a canteen type facility. The smaller building is 3m x 3m.

## **4.2 Heritage Significance**

Mowbray Park is included in the Queensland Heritage Register. However, the former East Brisbane Bowling Club building located within the park is not considered significant in its own right.

### **4.2.1 Queensland Heritage Register**

The QHR statement of significance for Mowbray Park is outlined in detail below under a discussion of the impacts of the proposed works.

### **4.2.2 Former East Brisbane Bowling Club building – heritage significance**

The *2017 Mowbray Park Conservation Management Plan* notes that the former East Brisbane Bowling Club building is not significant apart from the role it played in providing facilities for the ongoing operations of the bowls club.

The Queensland Heritage Register in its statement of the history for Mowbray Park notes that the whole of the park reserve is significant but the bowls and croquet club buildings are noted as not being of heritage significance.

## **5.0 Proposed works – impact on significance**

### **5.1 General impact assessment**

Given that the former East Brisbane Bowling Club building is not considered to be significant in its own right, it is anticipated that the adverse impacts on the heritage values of the park will be minimal. The following section provides a discussion of the impacts against each of each of the criterion that the park has been assessed as meeting (based on the Queensland Heritage Register).

### **5.2 Response to heritage significance criteria**

#### **Criterion A - The place is important in demonstrating the evolution or pattern of Queensland's history.**

Mowbray Park is significant for its close association with the development of East Brisbane, both in its early connection with the Mowbray family and their substantial land holdings in the suburb, and as an initiative of the former South Brisbane City Council in preserving urban public open space during a population and housing boom.

In a broader context, the stone retaining wall and steps are an important illustration of the evolution of recreational activity along the Brisbane River.

Mowbray Park, like Newstead Park, survives as important evidence of the riverine estates which lined much of the Brisbane River in the mid-19th century.

The memorial has cultural heritage significance as evidence of a widespread social movement expressing Australian patriotism and nationalism of the period, and belongs to a class of commemorative structures erected as a record of the local impact of a major historical event and intended to endure.

- *Response:* the proposed works will not impact on elements of historic significance in Mowbray Park.

**Criterion B - The place demonstrates rare, uncommon or endangered aspects of Queensland's cultural heritage.**

Mowbray Park, like Newstead Park, survives as important evidence of the riverine estates which lined much of the Brisbane River in the mid-19th century. Adjacent properties such as Shafston and Eskgrove, and Bulimba further downstream, did not survive the 19th century. Mowbray Park is one of comparatively few inner Brisbane parks which provides substantial open space with river views.

The East Brisbane War Memorial in Mowbray Park is significant for its aesthetic quality and craftsmanship, the rarity of the Australian Light Horseman statue in a Queensland war memorial, and as evidence of the work of established monumental masons W Batstone & Sons.

The East Brisbane War Memorial is important also as a unique source of historical information.

- *Response:* the proposed works will not impact on elements associated with the early estate or with the War Memorial.

**Criterion D - The place is important in demonstrating the principal characteristics of a particular class of cultural places.**

Mowbray Park, like Newstead Park, survives as important evidence of the riverine estates which lined much of the Brisbane River in the mid-19th century. Adjacent properties such as Shafston and Eskgrove, and Bulimba further downstream, did not survive the 19th century. Mowbray Park is one of comparatively few inner Brisbane parks which provides substantial open space with river views.

- *Response:* the proposed works will not impact on elements associated with the early estate. They have the potential to improve both the open space and views to the river.

**Criterion E - The place is important because of its aesthetic significance.**

Mowbray Park is one of comparatively few inner Brisbane parks which provides substantial open space with river views.

Mowbray Park is a richly planted picturesque enclave which contributes to the local townscape, and contains a finely crafted War Memorial. The park contains early plantings and remnant structures which evidence its evolution and earlier use patterns.

The East Brisbane War Memorial in Mowbray Park is significant for its aesthetic quality and craftsmanship, the rarity of the Australian Light Horseman statue in a Queensland war memorial, and as evidence of the work of established monumental masons W Batstone & Sons.

- *Response:* the proposed works have the potential to improve both the open space and views to the river. The works will not impact on the War Memorial. They could potentially impact nearby mature tree plantings. There is a mature *Ficus benjamina* and two *Castenospermum australe* trees along the eastern edge of the building. An arborist will be engaged to advise on tree protection measures for the works to ensure that any adverse effects to the trees are minimized.

**Criterion G - The place has a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.**

It has been the focus of local community recreational and memorial activity for over 90 years.

The boat house, and the retaining wall and steps associated with the former baths, are evidence of the park's riverside community recreation role.

- *Response:* The former East Brisbane Bowling Club building was home to the bowling club from the mid-1970s (when their original clubhouse was demolished) until 2010, when they closed due to a lack of membership. They have not demonstrated a strong or special attachment to the building.
- The building was occupied for a short while by the Queensland African Community and has been occupied since around 2016 by Backbone Youth Arts Inc.– a period of 5-6 years.

Backbone Youth Arts Inc. is a not-for-profit organization that provides music performances, music and art workshops and theatre and art space for youth. They rent out spaces in the building for events.

Some Backbone members demonstrated their objection to the proposed demolition of the building which indicates that there could be some attachment to the building. Of note however, the Backbone Youth Arts organisation have stated that they are excited to be moving to new facilities at Seven Hills. The new facilities will much better serve the needs of an arts/performance organisation, and unlike the former bowls club building, have been very recently upgraded, providing the potential for Backbone to have a long-term home. This criterion has not been assessed specifically in relation to Backbone Youth Arts Inc. While it is apparent that some members of the organization do have an attachment to the building, given the relatively short occupation time frame, that they are only a local community group and that there does not appear to have been other forms of demonstrated attachment, it is unlikely that their attachment would meet the threshold for State significance for this criterion. Brisbane City Council has agreed to provide an alternative venue to house the Backbone Youth Arts Inc.

- Based on the above it is anticipated that the proposed works would not have a significant adverse impact on the social values associated with Mowbray Park.

**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.**

Mowbray Park is significant for its close association with the development of East Brisbane, both in its early connection with the Mowbray family and their substantial land holdings in the suburb, and as an initiative of the former South Brisbane City Council in preserving urban public open space during a population and housing boom.

The East Brisbane War Memorial in Mowbray Park is significant for its aesthetic quality and craftsmanship, the rarity of the Australian Light Horseman statue in a Queensland war memorial, and as evidence of the work of established monumental masons W Batstone & Sons.

- *Response:* The former East Brisbane Bowling Club building does reflect aspects of the development of East Brisbane. However, given that it was built in the mid-1970s it does not have an association with the Mowbray family or the former South Brisbane City Council discussed above under this criterion. The proposed works will therefore not adversely impact the heritage values of Mowbray Park identified under this criterion.

### **5.3 Response to conservation management plan**

The draft Mowbray Park Conservation Management Plan was prepared by City Projects Office (CPO) in 2017 in response to the proposed Wynnum Road Widening. It was an update of the 1995 *Mowbray Park: Conservation Plan* prepared by Allom Lovell Marquis-Kyle Architects.

In relation to the former East Brisbane Bowling Club building, the following is noted on p.38 under a discussion of individual elements:

*The existing club house was built in the 1970s following the widening of Lytton Road and is not significant apart from the role it played in providing facilities for the ongoing operations of the bowls club during the interim period.*

The proposed demolition of the former East Brisbane Bowling Club building is not contrary to the draft (2017) Mowbray Park Conservation Management Plan.

## **6.0 Conclusion**

The proposed demolition of the former East Brisbane Bowling Club building and ancillary outbuildings has stemmed from a vision exercise for Mowbray Park which has involved extensive community consultation. The building does not meet current facility expectations which would require significant funds to remedy. It does not sit well within the broader park context and is considered by some members of the community to be an "eyesore". The above assessment concludes that the proposed demolition will not have a significant adverse impact on the heritage significance of Mowbray Park.



## Mowbray Park - Early Works



**Date :** 21/02/2022 9:34:56 AM

**From :** Section 78B(2)(c)

**To :** "Sarah Foley" , "Benjamin Carson"

**Subject :** 202112-16010 EC - Mowbray Park

**Attachment :** image001.png;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;

Ben and Sarah

Thank you for your time thus far in relation to the proposed Bowls club building demolition. At this time, we would like to leave the HEC with you, not yet withdraw and seek that you do not refuse it. Given the timeframes, we lodged the response to the information request to you 7<sup>th</sup> February, assuming you have 20 business days to assess our response, can we please have until 4<sup>th</sup> March to withdraw the application?

Happy to chat.

Kind regards,

Section 78B(2)(c)

Senior Urban Planner, Planning and Environment, Built and Natural Environment | Planning & Design  
Brisbane Infrastructure | **BRISBANE CITY COUNCIL**

Section 78B(2)(c)

Green Square | Level 2, 505 St. Pauls Terrace, Fortitude Valley, QLD 4006  
Phone: Section 78B(2)(c) @brisbane.qld.gov.au



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Date : 7/02/2022 2:28:50 PM

From : "Sarah Foley"

To : "Benjamin Carson"

Subject : FW: 202112-16010 EC - response to information request

Attachment : Attachment C - Mowbray Park - Concept plan.pdf; Attachment A - 202112-16010\_EC\_(QHR600189)\_

\_Information\_Request\_.pdf; Attachment B - Response to information

request.pdf; image001.png; image002.png; image003.png; image004.png; image005.png; image006.png; image007.png; image008.png; image009.png; image010.png;

Hi Ben,

Cc'ing this in to you. BCC has made a written response to our information request for Mowbray Park. Could you review it and let me know when suits (tomorrow/Wed is fine) to discuss if this is worth considering for an EC or if it still doesn't threshold for this level of application.

Thanks,

Sarah.



**Sarah Foley**  
A/ Cultural Heritage Coordinator | Heritage Architect

Heritage: Environment Policy and Programs  
Department of Environment and Science

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Environmental Policy and Programs acknowledges the Traditional Owners and Custodians of the lands, waters and seas on which we work and live paying respects to Elders, past, present and future.

Heritage branch is temporarily working remotely to manage the spread of COVID-19 in Queensland. It is best to contact us via email or Teams'

- For enquiries about the Queensland Heritage Register: [heritage@des.qld.gov.au](mailto:heritage@des.qld.gov.au)
- To contact the Queensland Heritage Council: [heritage.council@des.qld.gov.au](mailto:heritage.council@des.qld.gov.au)
- Report damage to Queensland Heritage Register places : [pollutionhotline@des.qld.gov.au](mailto:pollutionhotline@des.qld.gov.au)
- For enquiries about getting approval to do development at a Queensland heritage place: [palm@des.qld.gov.au](mailto:palm@des.qld.gov.au)
- For enquires about terrestrial archaeology and underwater cultural heritage like historic shipwrecks: [archaeology@des.qld.gov.au](mailto:archaeology@des.qld.gov.au)



From: [Section 78B\(2\)\(c\)@brisbane.qld.gov.au](mailto:Section 78B(2)(c)@brisbane.qld.gov.au)

Sent: Monday, 7 February 2022 2:22 PM

To: Sarah Foley

Subject: 202112-16010 EC - response to information request

Hi Sarah,

Further to our phone conversation and in response to the information request you issued (attachment A), we provide a letter of response, providing further explanation for the works onsite and a draft concept plan. The concept plan further outlines the intent for future park works giving DES the opportunity to understand the wholistic intent for the park and how the proposed building removal fits into this bigger picture.

We understand the future concept plan (when designed are finalised) will be lodged as a Material Change of Use Development application, however at this time the design is not final

As mentioned on the phone the works to finalise the concept plan have not been undertaken and as such the HEC for the building removal was lodged in the interim.

When you have had a chance to review this information please give me a call to discuss.

Kind regards,

[Section 78B\(2\)\(c\)@brisbane.qld.gov.au](mailto:Section 78B(2)(c)@brisbane.qld.gov.au)

Senior Urban Planner, Planning and Environment, Built and Natural Environment | Planning & Design  
Brisbane Infrastructure | [BRISBANE CITY COUNCIL](https://www.brisbane.qld.gov.au)

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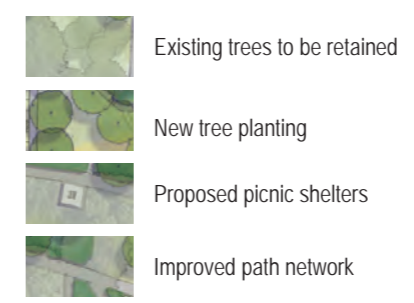
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**Legend**

- 1** Parkour/multi use play space to provide new play opportunities.
- 2** Open kickabout space and picnic shelters, provides open space for gatherings, allows views across the river.
- 3** New garden beds with colourful plants and low planting to facilitate views through the park.
- 4** Upgraded public amenities accessible from playground and open space.
- 5** Reconfigured carpark with shade tree planting and garden beds.
- 6** New pathway to connect to northern side of the park.
- 7** Terraced steps to transition between park levels, provides informal seating and views to the park.
- 8** Existing playground to be extended to the south.
- 9** Retain and upgrade picnic facilities. Install creative lighting to activate park in the evening.
- 10** Reinstate bandstand as open contemporary structure. Placement takes advantage of river views.
- 11** Existing vegetation footprint to be maintained.
- 12** Opportunity for new connecting path from Eskgrove St.
- 13** Accessible parking bays to service Ferry terminal access and lower part of the park.



**Notes**  
 - Mowbray Park is a heritage listed park.  
 - Park improvements to be staged according to available budget.  
 - Proposed works subject to further detailed design and site investigations.

# Mowbray Park - Final Concept Plan

21-431  
**FOR DISCUSSION PURPOSES ONLY**

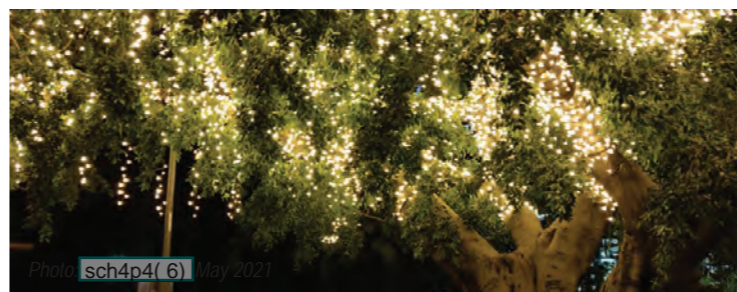
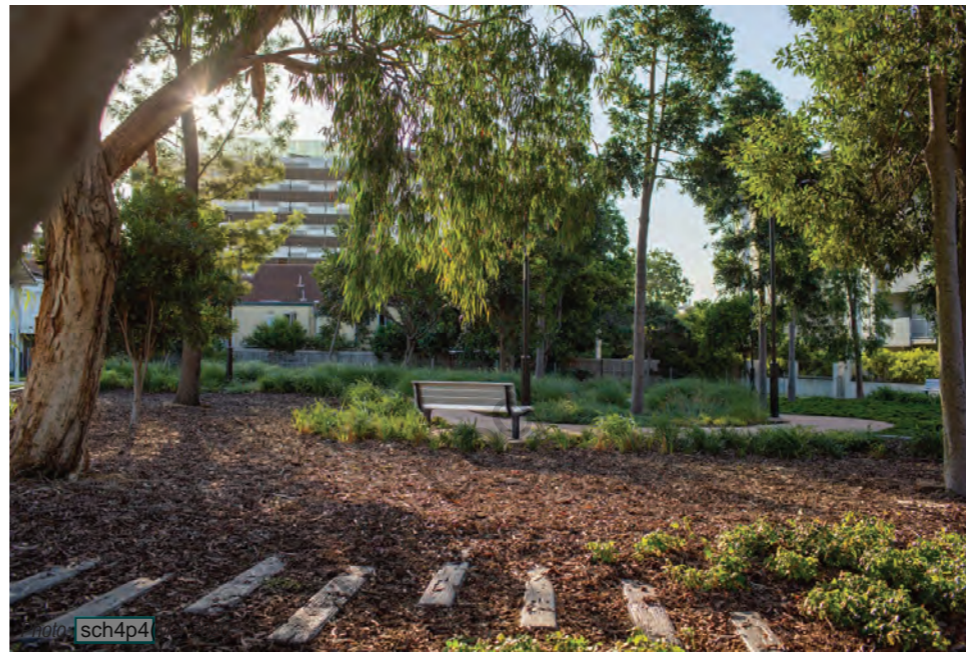
File A



Date: 16.12.2021  
 Sheet: 1 of 1  
 Issue: 1



*Dedicated to a better Brisbane*



# Mowbray Park - Final Concept Plan

21-431

FOR DISCUSSION PURPOSES ONLY

File A

Date: 16.12.2021  
Sheet: 2 of 1  
Issue: 1



Dedicated to a better Brisbane

## Queensland Heritage Act 1992

### Information Request Notice on Exemption Certificate Application

<b>Application no:</b>	202112-16010 EC
<b>Date application received:</b>	21 December 2021
<b>Date notice given:</b>	12 January 2022
<b>Applicant:</b>	Brisbane City Council Section 78B(2)(c) Senior Urban Planner, City Projects Office <a href="mailto:bj-cpo-planenv@brisbane.qld.gov.au">bj-cpo-planenv@brisbane.qld.gov.au</a>
<b>QHR place ID:</b>	600189
<b>QHR place name:</b>	Mowbray Park and East Brisbane War Memorial
<b>Location:</b>	33, 60 and 78 Lytton Road EAST BRISBANE 4169 – Lot 1 RP174592; Lot 49 and 50 on CPB123411.
<b>Application summary:</b>	Building Work - demolition of former East Brisbane Bowls Club Building and outbuildings.

This notice is issued under section 73(1) of the *Queensland Heritage Act 1992* to advise that further information is required to decide the application for an exemption certificate to carry out the development described above.

It has been determined that removal of the bowls club buildings, as a discreet development, would result in more than minimal detrimental impact on the cultural heritage significance of State heritage place, because the removal of the bowls club buildings renders the recreational use of the bowling green defunct as a recreational activity provided at the place. Without signalling a replacement structure providing equal amenity for the site, which is deemed to be of critical recreational importance, the lack of clarity regarding the future use of the area and that these future changes are not addressed in the application shows that this is not the appropriate assessment pathway. This is because without indication of a future use, DES Heritage is unable to determine if this change is of minimal detrimental impact to the State heritage place.

- 'Mowbray Park and East Brisbane War Memorial' (Mowbray Park) was entered in the Queensland Heritage Register (QHR) when the *Queensland Heritage Act 1992* came into force. The QHR listing covers three large freehold lots on the Brisbane River at East Brisbane and includes a former bowls club building and the bowls greens.
- The former bowls club building was constructed in the 1970s and the QHR entry identifies that the buildings themselves are not significant by stating: the "bowls and nearby croquet club building are not of cultural heritage significance".
- The area of Mowbray Park occupied by the former bowls club, however, is integral to the park, as evidence of an early and long-standing form of recreation available to the local community - at the time of entry on the Queensland heritage register this included recreation that required the amenity of an indoor space.

The history component of the QHR entry notes, "in a report presented to the full Council on 14 December 1903, the advantages of the site for a public park were enumerated: Mowbray's property is in every way suitable for a public

**Queensland Heritage Act 1992**  
**Information Request Notice – Exemption Certificate**

Version 1.2 – 25 November 2020

*park or garden having suitable soil, and undulating land reaching to the water's edge, and in addition it will also provide the necessary accommodation for **bowling greens, Tennis Courts, and Croquet lawns.***

- The QHR entry recognises the high “**importance of the park as a focus of community recreation**”. The History element of the QHR entry states “**the whole park reserve is significant.**”
- The current exemption certificate application addresses that the buildings themselves are not of particular heritage significance however the application does not signal the future use of the area of the bowling green or the provision of new interior recreation space to replace the amenity lost by demolition of the bowls club.
- Readily available online published ‘draft vision’ shows a rendering of a carpark replacing the bowling green and text notes the ‘*carpark shifted to bowls green to allow more active riverfront green space.*’ (Source image appended)
- This replacement of bowls green with carpark indicates that the change is of more than minimal detrimental impact to the State heritage place.

**Further Information to be provided to the Department of Environment and Science:**

The applicant is advised that there are two ways to proceed:

- 1.) If it is decided to continue with the piecemeal application of exemption certificate for removal of the bowls club buildings, BCC would need to provide a satisfactory Information Request response to demonstrate that the development will result in at most minimal detrimental impact on the place’s cultural heritage significance. The masterplan of the Mowbray park proposal, **addressing the continuity of the recreational use of the site** would need to be-supplied as part of the application / information request response. BCC would need to show how an equivalent and similar type of structured recreational activity is provided at the place and the HIS needs to address Criteria G&H of the Statement of significance of the QHR entry.

or

- 2.) withdraw the Exemption certificate application and make a Development Approval response to SARA as assessment manager. Demolition of the former bowls club building and its two bowling greens and associated outbuildings can be applied for as a development approval under the Planning Act 2016. The State Assessment and Referral Agency would be the assessment manager and the ‘State Development Assessment Provisions’ the applicable assessment benchmark, in particular ‘State code 14: Queensland heritage.’

A response to this information request must be received within 60 business days of the date this notice is given, with the receipt date being the 7 April 2022, or the application will be taken to have been withdrawn.

Please send the response to [palm@des.qld.gov.au](mailto:palm@des.qld.gov.au) with a copy to the project manager at: [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au).

If discussion of these issues is required, contact the project manager, Sarah Foley, Principal Heritage Officer, on (07) 3330 5160 or via email [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au).

sch4p4( 6) Personal information

Ben Carson  
**A/Manager, Heritage**  
Department of Environment and Science  
Delegate for the Chief Executive  
administering the *Queensland Heritage Act 1992*



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**City Projects Office**

Green Square, South Tower Level 2,  
505 St. Pauls Terrace  
FORTITUDE VALLEY QLD 4006  
GPO Box 1434  
BRISBANE QLD 4001

Telephone 07 3403 8888

Permit and Licence Management  
Department of Environment and Science  
GPO Box 2454  
Brisbane QLD 4001

7 February 2022

Dear Sarah

**APPLICATION NO: 202112-16010 EC – RESPONSE TO INFORMATION REQUEST FOR HERITAGE EXEMPTION CERTIFICATE APPLICATION – MOWBRAY PARK AND EAST BRISBANE WAR MEMORIAL (QHR: 600189) – LOCATED AT 33, 60 AND 78 LYTTON ROAD EAST BRISBANE 4169**

Reference is made to the Department of Environment and Science (DES) information request dated 12 January 2022 for heritage exemption certificate application lodged 21 December 2021. Brisbane City Council's (Council) City Projects Office has prepared a response to the information request. Response is provided below.

Information request item

- 1.) *provide a satisfactory Information Request response to demonstrate that the development will result in at most minimal detrimental impact on the place's cultural heritage significance. The masterplan of the Mowbray park proposal, **addressing the continuity of the recreational use of the site** would need to be supplied as part of the application / information request response. BCC would need to show how an equivalent and similar type of structured recreational activity is provided at the place—and the HIS needs to address Criteria G&H of the Statement of significance of the QHR entry.*

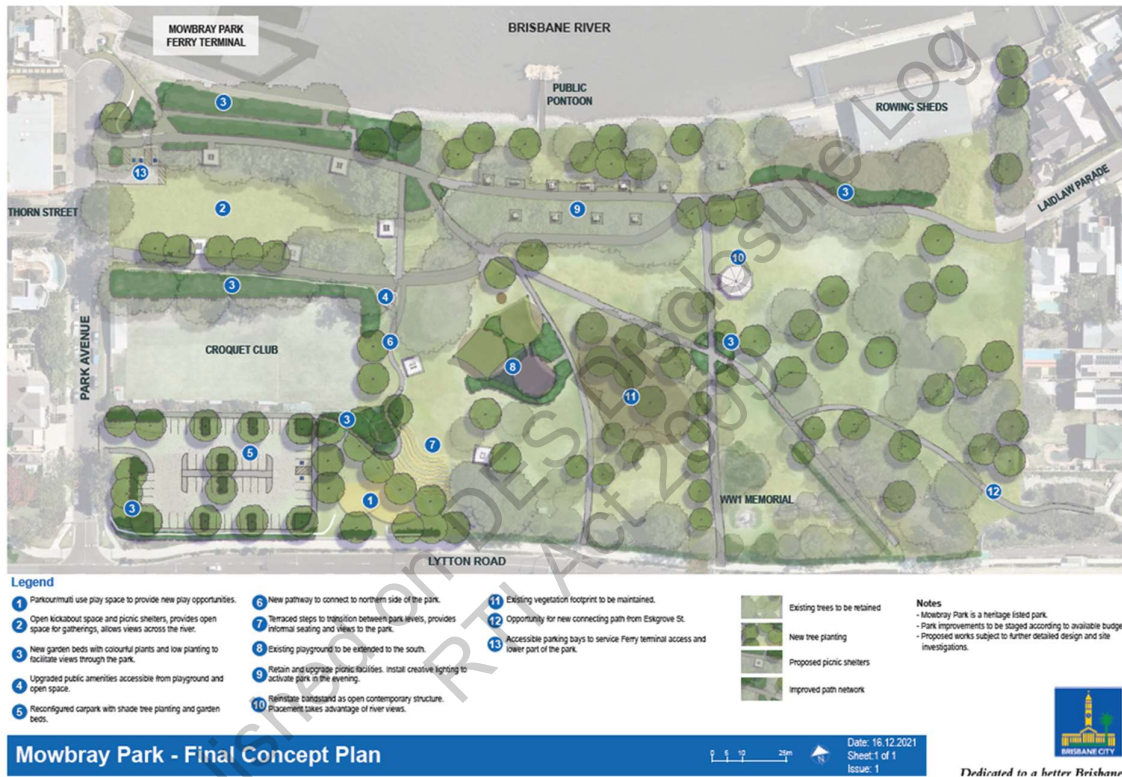
The proposal as submitted is for a small portion of the overall work intended for Mowbray Park. The decision to lodge a single initial HEC to assess the removal of the Bowls club building stems from a desire to remove the building rather than spend unnecessary money on its upkeep when the built form is not reflective of the desired future use of the park and the building is no longer intended to be tenanted past March 2022

Whilst Council respects DES' observation that the application may appear to be piecemeal, the work represents part of a broader concept intended for the entire park which is shown in the attached plan. The concept plan has been formulated through assessment of site opportunities and constraints, and consultation with the public, but not yet been developed to a point that it can be represented by design plans sufficient in detail to be suitable for an application. Removal of the Bowls club building is proposed as a first stage of works with subsequent upgrades consistent with the attached plan. There is a desire to remove the building to allow for appropriate detailed design investigations to be undertaken and prepare the site for future works.



The intended overall use and upgrade of the park includes:

- New play opportunities in response to community wishes
- New open recreation space on the riverside
- New pathway connections throughout the park as determined necessary and useful – finalised details not yet known and subject to heritage liaison
- Upgraded public amenities
- Relocate carpark away from the prime riverfront recreation space to allow for reinstatement of open recreation space on the riverside
- Terraced steps from carpark and parkour/new playground area along the Lytton Road frontage down to the park
- Retain and upgrade picnic facilities
- Reinstatement bandstand – future works – detail not yet known.



**Figure 1:** Mowbray Park Concept plan – subject to change through detailed design phase

As shown on the concept plan and notes – the future works will be assessable under the gambit of a development application (DA) to DES. The works may also constitute a material change of use application to Brisbane City Council’s Development Services, however this is subject to final scope and further planning investigations. It is premature to prepare the development application at this time, as outstanding site investigations are yet to take place.

The short-term intent to remove the existing bowls club building, stems from a fiscal decision to limit expenditure on the maintenance upkeep of a building that is no longer fit for purpose and is inconsistent with Mowbray Park’s vision to create more greenspace that is open and accessible by all members of the community. The bowling green has long since ceased operation. The continuity of the recreational use of the site does not relate strictly to the building as the building was built for the purpose attached to the bowls club which is no longer in use.

Council acknowledges there is a historical recreation element referred to in the QHR listing of the park and an inferred historical recreation use attached to the building, however, as the bowls club and greens have ceased use it is considered the use of the building does not have an inherent stand-alone community recreation use as intended to be protected by the QHR listing. Following cessation of the

formal recreation use in 2010, Council has permitted two interim tenants occupy the site, pending Council's review of the park's values and contribution to the open space network, and funding availability to enhance and upgrade the park. The use until most recently was for a youth arts program which is relocating to new premises in February 2022.

As mentioned in s2.2.3 of the Heritage Impact Assessment – the consultation with the local community for Mowbray Park found a desire for increased green open space. In the short term, it would be Council's intent that the area, currently home to the building is be turfed for open space use, until the further detail design is finalised, and the DA submitted.

In support of the bowls club building removal as a stand-alone proposal, the following is provided:

- The buildings and bowling greens have not been associated with a formal recreation use in over a decade, as the former Bowls Club closed, and bowling activity ceased in 2010.
- The building is no longer used by the associated community recreation use. The current tenant has new, purpose-built premises offsite, and no new lessee will be sought.
- The building, whilst structurally sound, needs substantial financial expenditure for upkeep.
- The building is poorly designed and oriented relative to the key activity nodes of the park, such as playground. It physically severs the south west corner of the park from the rest of the park and creates park user personal safety risks with its design (lack of passive surveillance, undercroft attracting antisocial behaviour).
- It is inconsistent with the vision for Mowbray Park's future; therefore, it is considered unfeasible for the building to remain on site (given it is no longer fit for purpose nor associated with community recreation onsite).
- Open recreation space has been identified through community consultation as a desired recreation outcome for the park
- Future DA is proposed to complete the park upgrade – as detailed above
- The use of the area currently occupied by the buildings will be available for open recreation in the short term. The long-term use is in design phase and a subsequent DA will be lodged once detailed design is finalised.
- The works proposed by the concept plan (future DA) will represent a mix of formalised (e.g. playground/s, terraced seating) and informal (grassed open areas)
- Other work intended (detailed design not yet finalised) involves a shift of the majority of the public carpark away from the river to the less desirable open space location on the corner of Lytton Road and Park Avenue. It is easily imagined that this corner would be better suited to carparking, bringing park visitors down to interact with the river's edge.

In support of this information request response, we provide the following

- Attachment 1: The previously submitted **Heritage Impact Assessment** that provides detailed support for the removal of the building as part of the early works
- Attachment 2: Mowbray Park concept plan

I trust this information is sufficient for your purposes and demonstrates that the proposed works will provide an updated recreation space more suited to current park user recreation needs and will not have a detrimental impact on the cultural heritage significance of the park.

Should you require any additional information or clarification, please do not hesitate to contact me on [Section 78B\(2\)\(c\)](#) or email [BI-CPO-PlanEnv@brisbane.qld.gov.au](mailto:BI-CPO-PlanEnv@brisbane.qld.gov.au)

Kind regards,

[sch4p4\( 6\) Person](#)

[Section 78B\(2\)\(c\)](#)

**Senior Urban Planner**  
**Planning and Environment Unit**  
**City Projects Office**

Date : 20/05/2022 12:18:09 PM

From : "Sarah Foley"

To : "Benjamin Carson"

Subject : FW: 202112-16010 EC (QHR600189) Mowbray Park - Bowls Club Demolition HEC

Attachment :

image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;image009.png;image011.png;image013.png;image001.png;image008.png;

Sorry Ben,

Just a prompt to say Section is still keen to get this 'letter of reasons'.

What about you and I meet on Tues when you're back and you just brief me again about your most important points and I'll relook at the letter to see if I can help get it refined cos I know when I looked at it, it was before it was even withdrawn.

Thx. Sarah.



**Sarah Foley**

Principal Heritage Officer | Heritage Architect

Heritage: Environment Policy and Programs  
Department of Environment and Science

E sarah.foley@des.qld.gov.au

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Level 27, 400 George Street, Brisbane Qld 4000

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- To contact the Queensland Heritage Council: [heritage.council@des.qld.gov.au](mailto:heritage.council@des.qld.gov.au)
- Report damage to Queensland Heritage Register places : [pollutionhotline@des.qld.gov.au](mailto:pollutionhotline@des.qld.gov.au)
- For enquiries about getting approval to do development at a Queensland heritage place: [palm@des.qld.gov.au](mailto:palm@des.qld.gov.au)
- For enquires about terrestrial archaeology and underwater cultural heritage like historic shipwrecks: [archaeology@des.qld.gov.au](mailto:archaeology@des.qld.gov.au)



From: Section 78B(2)(c)@brisbane.qld.gov.au>

Sent: Friday, 20 May 2022 12:13 PM

To: Sarah Foley

Subject: RE: 202112-16010 EC (QHR600189) Mowbray Park - Bowls Club Demolition HEC

Sorry Sarah, just wondering if we can expect this letter at any point?

Kind regards,

Section 78B(2)(c)

Senior Urban Planner, Planning and Environment, Built and Natural Environment | Planning & Design  
Brisbane Infrastructure | [BRISBANE CITY COUNCIL](https://www.brisbane.qld.gov.au)

Section 78B(2)(c)

Green Square | Level 2, 505 St. Pauls Terrace, Fortitude Valley, QLD 4006

Phone: Section 78B(2)(c)@brisbane.qld.gov.au



From: Sarah Foley <[Sarah.Foley@des.qld.gov.au](mailto:Sarah.Foley@des.qld.gov.au)>

Sent: Monday, 9 May 2022 11:31 AM

To: Section 78B(2)(c)@brisbane.qld.gov.au>

Cc: State Heritage Development <[StateHeritageDevelop@des.qld.gov.au](mailto:StateHeritageDevelop@des.qld.gov.au)>

Subject: 202112-16010 EC (QHR600189) Mowbray Park - Bowls Club Demolition HEC

*This email originates from outside of Brisbane City Council.*

Hi Section

Thanks. Ben is back on board today and promised in the teams meeting to address your letter as a matter of priority.

In terms of the Heritage Impact Assessment, what was most remiss in the EC application was the comparative analysis of the removal of this (bowling green) recreation facility versus the introduction or replacement of an equivalent 'recreation facility'

*Noted that the EC was being requested for the club, not the green but it was surmised that a green without a club voids the recreational use.*

It would still be important to address this in the DA, given it is the recreational use of the State Heritage place that will be under most

consideration, given that is where the primary significance lies in the register entry. Further detail to be supplied showing the proposal for the bowls club to ensure the continuity of recreational use. If the recreational use is not exactly on the green location, note the introduction of structured recreational use across the whole site within the Heritage boundary.

I'll mention the question to Ben and ask him to include any further thoughts on the HEC when he's reviewing the reasons letter.

Regards, Sarah.



**Sarah Foley**  
Principal Heritage Officer | Heritage  
Architect  
Heritage: Environment Policy and Programs  
Department of Environment and Science

E [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au)  
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GPO Box 2454, Brisbane QLD 4001

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- For enquires about terrestrial archaeology and underwater cultural heritage like historic shipwrecks: [archaeology@des.qld.gov.au](mailto:archaeology@des.qld.gov.au)



From: Section 78B(2)(c) <[Section 78B\(2\)\(c\)@brisbane.qld.gov.au](mailto:Section 78B(2)(c)@brisbane.qld.gov.au)>

Sent: Monday, 9 May 2022 11:01 AM

To: Sarah Foley

Subject: Mowbray Park - Bowls Club Demolition

Hi Sarah

We are going to start preparing the development application to SARA for the building work on a QLD heritage place for the demolition of the bowls club (only). As the passage of time has dulled my memory of our conversations, I am hoping you might be able to provide advice for us on the acceptability of the Attached Heritage impact assessment as it relates to a DA (rather than as it was prepared for the HEC). We will arrange for the SDAP to be addressed in addition to this report but wonder if the report will need amending. I had thought Ben had said he was happy with the level of information provided but at the same time I don't want to miss anything when we lodge, to help streamline the DA assessment.

Thanks for your help

Kind regards,

Section 78B(2)(c)

Senior Urban Planner, Planning and Environment, Built and Natural Environment | Planning & Design  
Brisbane Infrastructure | **BRISBANE CITY COUNCIL**

Section 78B(2)(c)

Green Square | Level 2, 505 St. Pauls Terrace, Fortitude Valley, QLD 4006

Phone: Section 78B(2)(c) <[Section 78B\(2\)\(c\)@brisbane.qld.gov.au](mailto:Section 78B(2)(c)@brisbane.qld.gov.au)>



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Date : 8/03/2022 9:21:50 AM

From : "Benjamin Carson"

To : "State Heritage Development"

Subject : FW: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Attachment : image001.png;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;

FYI – I have saved to eDOCS and made the decision in LHIS.

---

From: [Section 78B\(2\)\(c\)](#) brisbane.qld.gov.au>

Sent: Monday, 7 March 2022 12:32 PM

To: Benjamin Carson

Cc: Sarah Foley, [Section 78B\(2\)\(c\)](#)

Subject: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Ben, Sarah

Thank you for your time thus far in relation to Brisbane City Council – City Projects Office HEC application to remove the existing Bowls Club building (and associated outbuildings). As we understand DES are of the opinion that the application is more suited to the Development Application (DA) pathway and as such request to withdraw the HEC (202112-16010 EC). We request that DES please provide a statement of reasons outlining the threshold limit for this decision and provide detail on the preferred assessment pathway and any required supporting information to better allow us to progress towards DA.

Please don't hesitate to contact me if you have any further questions.

Kind regards,

[Section 78B\(2\)\(c\)](#)

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Brisbane Infrastructure | [BRISBANE CITY COUNCIL](#)

[Section 78B\(2\)\(c\)](#)

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Date : 7/03/2022 12:32:03 PM

From : Section 78B(2)(c)

To : "Benjamin Carson"

Cc : "Sarah Foley" Section 78B(2)(c)

Subject : Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Attachment : image001.png;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;

Ben, Sarah

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Please don't hesitate to contact me if you have any further questions.

Kind regards,

Section 78B(2)(c)

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Date : 7/02/2022 4:01:10 PM

From : "Sarah Foley"

To : "Benjamin Carson"

Subject : RE: 202112-16010 EC - response to information request

Attachment :

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Will do.

She had indicated that they'd got some well resolved plans and 3d studies etc and was adamant that they were providing equivalent recreational facilities.

From what they've provided though, it does keep the level of open space and the carparking is convincing but still not an equivalent 'structured' recreational facility that would offset the loss of the bowl club.

Anyway, yes, take it on board and will leave it in your court for now.



**Sarah Foley**  
A/ Cultural Heritage Coordinator | Heritage Architect

**Heritage: Environment Policy and Programs**  
Department of Environment and Science

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GPO Box 2454, Brisbane QLD 4001

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---

**From:** Benjamin Carson <Benjamin.Carson@des.qld.gov.au>

**Sent:** Monday, 7 February 2022 3:58 PM

**To:** Sarah Foley

**Subject:** RE: 202112-16010 EC - response to information request

Maybe hold off. I'll have a good look at what they've provided in the morning. I'll have a chat with CC and then call Section It would be best if they withdraw the application.

---

**From:** Sarah Foley <[Sarah.Foley@des.qld.gov.au](mailto:Sarah.Foley@des.qld.gov.au)>

**Sent:** Monday, 7 February 2022 3:33 PM

**To:** Benjamin Carson

**Subject:** RE: 202112-16010 EC - response to information request

Ok, I'll draft a written response tomorrow and run it by you.

Thx.



**Sarah Foley**  
A/ Cultural Heritage Coordinator | Heritage Architect

**Heritage: Environment Policy and Programs**  
Department of Environment and Science

E [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au)  
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- For enquires about terrestrial archaeology and underwater cultural heritage like historic shipwrecks: [archaeology@des.qld.gov.au](mailto:archaeology@des.qld.gov.au)





**From:** Benjamin Carson <[Benjamin.Carson@des.qld.gov.au](mailto:Benjamin.Carson@des.qld.gov.au)>  
**Sent:** Monday, 7 February 2022 3:32 PM  
**To:** Sarah Foley  
**Subject:** RE: 202112-16010 EC - response to information request

I was hoping they wouldn't do that. I still think there are grounds to refuse as we can't take future works into account – they might never happen, or something different could happen.

**From:** Sarah Foley <[Sarah.Foley@des.qld.gov.au](mailto:Sarah.Foley@des.qld.gov.au)>  
**Sent:** Monday, 7 February 2022 2:29 PM  
**To:** Benjamin Carson  
**Subject:** FW: 202112-16010 EC - response to information request

Hi Ben,  
Cc'ing this in to you. BCC has made a written response to our information request for Mowbray Park. Could you review it and let me know when suits (tomorrow/Wed is fine) to discuss if this is worth considering for an EC or if it still doesn't threshold for this level of application.  
Thanks,  
Sarah.



**Sarah Foley**  
A/ Cultural Heritage Coordinator | Heritage  
Architect  
**Heritage: Environment Policy and Programs**  
Department of Environment and Science

E [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au)  
P 07 3330 5160  
Level 27, 400 George Street, Brisbane Qld 4000  
GPO Box 2454, Brisbane QLD 4001

and future.

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**From:** [Section 78B\(2\)\(c\)](#) <[brisbane.qld.gov.au](mailto:brisbane.qld.gov.au)>  
**Sent:** Monday, 7 February 2022 2:22 PM  
**To:** Sarah Foley  
**Subject:** 202112-16010 EC - response to information request

Hi Sarah,

Further to our phone conversation and in response to the information request you issued (attachment A), we provide a letter of response, providing further explanation for the works onsite and a draft concept plan. The concept plan further outlines the intent for future park works giving DES the opportunity to understand the wholistic intent for the park and how the proposed building removal fits into this bigger picture.

We understand the future concept plan (when designed are finalised) will be lodged as a Material Change of Use Development application, however at this time the design is not final  
As mentioned on the phone the works to finalise the concept plan have not been undertaken and as such the HEC for the building removal was lodged in the interim.

When you have had a chance to review this information please give me a call to discuss.

Kind regards,

[Section 78B\(2\)\(c\)](#)  
Senior Urban Planner, Planning and Environment, Built and Natural Environment | Planning & Design  
Brisbane Infrastructure | [BRISBANE CITY COUNCIL](#)

[Section 78B\(2\)\(c\)](#)

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Phone: [Section 78B\(2\)\(c\)](#) [@brisbane.qld.gov.au](#)



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Date : 7/02/2022 3:32:24 PM

From : "Benjamin Carson"

To : "Sarah Foley"

Subject : RE: 202112-16010 EC - response to information request

Attachment :

image008.png;image011.png;image012.png;image013.png;image014.png;image015.png;image016.png;image017.png;image018.png;image019.png;

I was hoping they wouldn't do that. I still think there are grounds to refuse as we can't take future works into account – they might never happen, or something different could happen.

---

From: Sarah Foley <Sarah.Foley@des.qld.gov.au>

Sent: Monday, 7 February 2022 2:29 PM

To: Benjamin Carson

Subject: FW: 202112-16010 EC - response to information request

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Thanks,

Sarah.



Queensland  
Government

**Sarah Foley**

A/ Cultural Heritage Coordinator | Heritage  
Architect

Heritage: Environment Policy and Programs  
Department of Environment and Science

---

E [sarah.foley@des.qld.gov.au](mailto:sarah.foley@des.qld.gov.au)

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---

From: Section 78B(2)(c) [brisbane.qld.gov.au](mailto:brisbane.qld.gov.au)>

Sent: Monday, 7 February 2022 2:22 PM

To: Sarah Foley

Subject: 202112-16010 EC - response to information request

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Kind regards,

Section 78B(2)(c)

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Brisbane Infrastructure | [BRISBANE CITY COUNCIL](https://www.brisbane.qld.gov.au)

Section 78B(2)(c)

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Date : 10/03/2022 10:49:44 AM

From : Section 78B(2)(c)

To : "Benjamin Carson"

Cc : Section 78B(2)(c)

Subject : RE: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Attachment : image001.png;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;image008.png;

Thanks Ben

If you can please have Section copied in to the letter when it is sent that would be great. sch4p4( 6) Personal information

Kind regards,

Section 78B(2)(c)

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Brisbane Infrastructure | BRISBANE CITY COUNCIL

Section 78B(2)(c)

Green Square | Level 2, 505 St. Pauls Terrace, Fortitude Valley, QLD 4006  
Phone: Section 78B(2)(c) @brisbane.qld.gov.au



From: Benjamin Carson <Benjamin.Carson@des.qld.gov.au>

Sent: Monday, 7 March 2022 1:54 PM

To: Section 78B(2)(c) @brisbane.qld.gov.au>

Subject: RE: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

*This email originates from outside of Brisbane City Council.*

Thank you Section

As discussed at the BCC / DES meeting last week, I will provide you with the reasons behind DES's threshold assessment and some preliminary information on what DES would require to assess an application made with SARA. We have a few people away at the moment due to both the pandemic and flooding, but I will do my best to have something to you as soon as possible.

Kind regards,

Ben



**Ben Carson**  
Cultural Heritage Coordinator | Heritage  
Environmental Policy and Programs  
Department of Environment and Science

E: [benjamin.carson@des.qld.gov.au](mailto:benjamin.carson@des.qld.gov.au)

Section 78B(2)(c)  
Level 27, 400 George Street, Brisbane QLD 4000  
GPO Box 2454, Brisbane 4001

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From: Section 78B(2)(c) @brisbane.qld.gov.au>

Sent: Monday, 7 March 2022 12:32 PM

To: Benjamin Carson

Cc: Sarah Foley; Section 78B(2)

Subject: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Ben, Sarah

Thank you for your time thus far in relation to Brisbane City Council City Projects Office HEC application to remove the existing Bowls Club building (and associated outbuildings). As we understand DES are of the opinion that the application is more suited to the Development Application (DA) pathway and as such request to withdraw the HEC (202112-16010 EC). We request that DES please provide a statement of reasons outlining the threshold limit for this decision and provide detail on the preferred assessment pathway and any required supporting information to better allow us to progress towards DA.

Please don't hesitate to contact me if you have any further questions.

Kind regards,

Section 78B(2)(c)

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Date : 7/03/2022 1:54:04 PM

From : "Benjamin Carson"

To : [Section 78B\(2\)\(c\)](#)

Subject : RE: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

Attachment : image001.png;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;image008.png;

Thank you [Section 7](#)

As discussed at the BCC / DES meeting last week, I will provide you with the reasons behind DES's threshold assessment and some preliminary information on what DES would require to assess an application made with SARA. We have a few people away at the moment due to both the pandemic and flooding, but I will do my best to have something to you as soon as possible.

Kind regards,  
Ben



**Ben Carson**  
Cultural Heritage Coordinator | Heritage  
Environmental Policy and Programs  
Department of Environment and Science

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From: [Section 78B\(2\)\(c\)](#) [brisbane.qld.gov.au](mailto:brisbane.qld.gov.au)>  
Sent: Monday, 7 March 2022 12:32 PM  
To: Benjamin Carson  
Cc: Sarah Foley; [Section 78B](#)  
Subject: Mowbray Park - Bowls club removal HEC (202112-16010 EC)

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