



Department of
Environment and Science

Our Ref: CTS 17838/23

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Dear Dr Buch

Decision about non-complying application for Yeerongpilly Railway Station – Shelter Shed and Office

Thank you for your application (**Application**) dated 15 September 2023 proposing entry of the Yeerongpilly Railway Station - Shelter Shed and Office (**Station Building**), Wilkie Street, Yeerongpilly in the Queensland Heritage Register (**Heritage Register**).

This document is the notice of decision, and reasons in respect of the decision, which has been made by me as delegate for the chief executive of the Department of Environment and Science (**Department**) pursuant to s.36A of the *Queensland Heritage Act 1992* (Qld) (**Heritage Act**).

1. Legislative framework and background

- 1.1. Under s.36(1)(a) of the Heritage Act, a person or other entity may apply to the chief executive to have a place entered in the Heritage Register as a State heritage place. The application must comply with the requirements of s.36(2) of the Act.
- 1.2. On 17 September 2023, an Application made pursuant to s.36 of the Heritage Act was sent to the Department, to enter the Station Building in the Heritage Register as a State heritage place.
- 1.3. The Application was preceded by another application to have the Station Building entered in the Heritage Register as a State heritage place. On 14 September 2023, a delegate of the chief executive of the Department gave notice that this previous application was not compliant with s.36(2) of the Heritage Act.

2. Evidence or other material on which findings on material questions of fact were based

- 2.1. In deciding pursuant to s.36A of the Heritage Act that the Application is not compliant, as the delegate of the chief executive of the Department, I had regard to the following documents and materials:
 - 2.1.1. relevant provisions of the following legislative and regulatory material being:

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- 2.1.1.1. the Heritage Act;
 - 2.1.1.2. *Assessing cultural heritage significance: Using the cultural heritage criteria: guideline*. Heritage Branch, Department of Environment and Heritage Protection, State of Queensland, 2013 prepared under s.173 of the Heritage Act (Guideline 1), available at https://www.qld.gov.au/__data/assets/pdf_file/0030/66693/using-the-criteria.pdf;
 - 2.1.1.3. *Application Guide: Entering a State Heritage Place in the Queensland Heritage Register*. Heritage Branch, Department of Environment and Heritage Protection, State of Queensland, 2013 prepared under s.173 of the Heritage Act (Guideline 2), available at https://www.qld.gov.au/__data/assets/pdf_file/0027/66735/ag_enter_place_qhr.pdf; and
- 2.1.2. material to which I, as the delegate of the chief executive of the Department, must have regard under s.36A of the Heritage Act, being:
- 2.1.2.1. the Application, including attachment documents.

3. Findings on material questions of fact

- 3.1. Based on the evidence and materials considered by me as the delegate of the chief executive of the Department (as detailed in Section 2 above), now set out below are my findings on material questions of fact in relation to whether the Application complies with s.36A of the Heritage Act.

Approved form

- 3.2. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application complies with the requirement regarding use of the approved form:
- 3.2.1. The approved form, available at <https://www.qld.gov.au/environment/land/heritage/register/changes>, has been used to make the Application.

Details, required in the approved form, to enable the chief executive to give the Queensland Heritage Council (Council) a heritage recommendation for the application

- 3.3. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes details to enable a heritage recommendation to be given to the Heritage Council under s.44 of the Heritage Act:
- 3.3.1. The Application includes details in the relevant fields of the approved form and in some fields, reference is made to attachments. These attachments are entitled Attachment A – Submissions of Application; Attachment B – Photographs of 2023: Yeerongpilly Booking Office; Attachment C – Yeerongpilly Yard Drawing, 1956; and Attachment D – Yeerongpilly Shelter Shed Drawing, 1896.
 - 3.3.2. The details provided include enough information to identify the location of the Station Building.
 - 3.3.3. Attachments B, C and D as identified in the approved form were not in fact attached to the email sent by the Railway Preservation Society of Queensland Incorporated (RPSQ), which submitted the Application on 17 September 2023.
 - 3.3.4. Attachment A, addressed to the Council, included a range of information and details, including images of historical photographs and technical drawings from Queensland

Rail records and the Queensland State Archives. The 1956 Yard drawing and the 1896 Shelter Shed drawing were included in Attachment A.

Written statement, that is based on and refers to historical research, about how the place satisfies each of the cultural heritage criteria the applicant considers relevant for the place

- 3.4. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes written statements that are based on and refer to historical research about how the place satisfies each of the cultural heritage criteria you consider relevant for the place:
- 3.4.1. Section 35 of the Heritage Act sets out eight cultural heritage criteria, and if a place satisfies one or more of them, it may be entered in the Heritage Register.
 - 3.4.2. Guidelines 1 and 2 assist when making an application for entry of a place in the Heritage Register.
 - 3.4.3. Guideline 1 provides a methodology for identifying and assessing places eligible for entry in the Heritage Register as State heritage places. These are places of state-level cultural heritage significance.
 - 3.4.4. Guideline 2 explains that the Heritage Register is an 'inventory of places of significance to the state' and places significant only to a local community are more appropriately managed through other means.
 - 3.4.5. The Application nominated cultural heritage criterion (a) as one of the relevant criteria for entry of the Station Building in the Heritage Register.
 - 3.4.6. The written statement for criterion (a) in the Application refers to the Yeerongpilly railway station being part of an important junction on the South Coast rail line, which facilitated general development and specifically suburban expansion in this part of Brisbane.
 - 3.4.7. The Application does not explain how the Station Building alone demonstrates an important aspect Queensland's history (in contrast to an important aspect of Brisbane's history) and provides no historical research to support the statement. The heritage boundary shown in section 8 of the Application's approved form, as proposed by the applicant, does not include any other element of railway infrastructure, such as the junction itself, other than the Station Building.
 - 3.4.8. The report referenced in the Application, 'A Heritage Management Survey' prepared by Buchanan Architects for Queensland Rail (QR), dated 2002, does not categorise the Station Building as being a place of state cultural heritage significance.
 - 3.4.9. The Application nominated cultural heritage criterion (b) as one of the relevant criteria for entry in the Heritage Register.
 - 3.4.10. The written statement for criterion (b) in the Application states that the Station Building is rare in the Brisbane suburban rail network for the period 1896 to 1897, but does not provide the reasoning for the narrow time-period selected that is supported by historical research. Research to support the statement that the State Building is rare should show a comparison with contemporary timber railway station buildings in Queensland has occurred and provide support for the contention that 1896 to 1897 is an important historical period on which to focus.
 - 3.4.11. The report referenced in the Application, 'A Heritage Management Survey' prepared by Buchanan Architects for QR, dated 2002, does not categorise the Station Building as being a place of state cultural heritage significance.
 - 3.4.12. The Application did not nominate cultural heritage criterion (c) as one of the relevant criteria for entry in the Heritage Register.

- 3.4.13. The Application nominated cultural heritage criterion (d) as one of the relevant criteria for entry in the Heritage Register.
- 3.4.14. The written statement for criterion (d) in the Application states that the place is highly intact and one of only two examples of double-gabled timber buildings from the period 1884 to 1896. No references to historical research or contemporary photographs of the Station Building have been provided to substantiate these statements.
- 3.4.15. The report referenced in the Application, 'A Heritage Management Survey' by Buchanan Architects for QR, dated 2002, does not categorise the Station Building as being a place of state cultural heritage significance.
- 3.4.16. The Application nominated cultural heritage criterion (e) as one of the relevant criteria for entry in the Heritage Register.
- 3.4.17. The written statement for criterion (e) in the Application explains that the Station Building retains its original character and is aesthetically pleasing, but not how these qualities might be important to Queensland as a whole.
- 3.4.18. The report referenced in the Application, 'A Heritage Management Survey' by Buchanan Architects for QR, dated 2002, does not categorise the Station Building as being a place of state-level cultural heritage significance.
- 3.4.19. The Application did not nominate cultural heritage criterion (f) as one of the relevant criteria for entry in the Heritage Register.
- 3.4.20. The Application nominated cultural heritage criterion (g) as one of the relevant criteria for entry in the Heritage Register.
- 3.4.21. The written statement for criterion (g) in the Application explains that there is a very strong association between the local community and the Station Building for it being a Yeerongpilly landmark, a site of social history and a reminder of wartime. This suggests the place may have local-level cultural heritage significance.
- 3.4.22. The written statement for criterion (g) in the Application explains that the Yeerongpilly Railway Station Building has been a functional meeting place for 127 years.
- 3.4.23. The report referenced in the Application, 'A Heritage Management Survey' by Buchanan Architects for QR, dated 2002, does not categorise the Station Building as being a place of state cultural heritage significance.
- 3.4.24. The Application nominated cultural heritage criterion (h) as one of the relevant criteria for entry in the Heritage Register.
- 3.4.25. The written statement for criterion (h) in the Application explains that Messrs Henry Charles Stanley, William Pagan and Henrik Hansen are persons of importance in Queensland's history, which is supported by the historical research referenced.
- 3.4.26. The written statement for criterion (h) in the Application does not address how the Station Building can be said to have a special or strong association with either Stanley, Pagan or Hansen.
- 3.4.27. The statement provides evidence of historical research that shows Stanley and Hansen signed off certain technical drawings associated with the Station Building, which illustrates the role they performed on numerous occasions across their careers, but does not provide clear historical research to support what is contended about Pagan.
- 3.4.28. The statement suggests that there being several places already on the Heritage Register with which Stanley and Hansen had a role is evidence of their strong or special association with the Station Building at Yeerongpilly.

- 3.4.29. The report referenced in the Application, 'A Heritage Management Survey' by Buchanan Architects for QR, dated 2002, does not categorise the Station Building as being a place of state cultural heritage significance.

Information about the history of the place that is based on and refers to historical research

- 3.5. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes information about the history of the place that is based on and refers to historical research:
- 3.5.1. In several locations, the Application includes information about the history of the place, some of which is based on and refers to historical research.

Copies or details of material used for the historical research, including, for example, photographs, maps, plans and historical titles information

- 3.6. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes copies or details of material used for the historical research:
- 3.6.1. In several locations, the Application includes copies and details of material used for the historical research.

Description of the features of the place that contribute to its cultural heritage significance, supported by photographs, drawings or other documents showing the features

- 3.7. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes a description of the features of the place that contribute to its cultural heritage significance, supported by photographs, drawings or other documents showing the features:
- 3.7.1. The approved form contains a field entitled '6. Description of the place'. For the Application, this field in the form did not contain a description of the features of the place that contribute to its cultural heritage significance.
- 3.7.2. No photographs of the Station Building dating to the present day (i.e., 2023) are provided with the Application.
- 3.7.3. The written statement for criterion (e) in the Application explains the Station Building features 'carved wood balustrades, ironwork, carved windows, weatherboard walls with corrugated iron roofing and complimented [sic] by cast iron timber seating', which contribute to the place being visually pleasing.

Plan showing the relationship between the place's cadastral boundaries, features mentioned in the description and the boundary proposed for the place

- 3.8. As the delegate of the chief executive of the Department, I made the following findings of fact in respect of whether the Application includes a plan showing the relationship between the place's cadastral boundaries, features mentioned in the description and the boundary proposed for the place:
- 3.8.1. The Application includes a plan showing the relationship between the cadastral boundaries of the allotment where the Station Building stands and the boundary proposed for the State heritage place.

4. Reasons for decision

- 4.1. Based on findings on the material questions of fact as set out above in Section 3, the reasons for my decision as delegate of the chief executive of the Department on the Application are as follows:
- 4.1.1. The written statements in the Application for cultural heritage criteria (a), (b), (d), (e), (g) and (h)—the criteria asserted as relevant to the Station Building—and the associated historical research were insufficient to support the contention that the Station Building may be of cultural heritage significance to Queensland rather than simply to the local area.
 - 4.1.2. The Application must include a description of the features of the place that contribute to its cultural heritage significance, supported by photographs, drawings or other documents showing the features.
 - 4.1.3. Information, including current photographs, describing the physical appearance of the Station Building and the features that contribute to its cultural heritage significance that exist in 2023 was not provided with the Application.

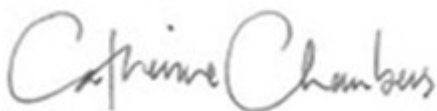
Under s.36A(2)(c) of the Heritage Act, you may make a new application that addresses the reasons mentioned in Section 4 above.

To support its consideration of the Application, the Department has undertaken an assessment of the Station Building. This assessment concluded the place is unlikely to satisfy any of the cultural heritage criteria in s.36 of the Heritage Act, which are relevant to a determination about state-level cultural heritage significance.

The Department found that the Station Building is one of approximately 33 extant examples of its building type across Queensland, and has been substantially altered through extension, other physical changes and remodelling of its interior such that it is no longer intact as an 1895 Shelter Shed and Office building servicing a rail line. Constructed to a standard Department of Railways' design, no evidence could be found of a special or strong association with architects or engineers employed by that agency.

Should you require any further information, you may contact Ms Joanne McAuley, A/Team Leader - Heritage, Environment and Heritage Policy and Programs of the department on telephone 0439 524 458 or by email at joanne.mcauley@des.qld.gov.au.

Yours sincerely



Catherine Chambers
Director, Heritage

Delegate for the chief executive of the Department under section 36A of the *Queensland Heritage Act 1992*