

31 August 2018

Brisbane City Council
GPO Box 1434
Brisbane Qld 4001

Dear Sir / Madam,

Submission: 645 Seventeen Mile Rocks Road, Sinnamon Park (DA # A004814571)

Thank you for providing the opportunity to provide a submission regarding the proposed development of a childcare facility at Sinnamon Farm, 645 Seventeen Mile Rocks Road, Sinnamon Park.

Background

Sinnamon Farm is listed as a heritage item on the following registers:

- ✎ Register of the National Trust of Australia (Queensland);
- ✎ Brisbane City Council Heritage Schedule; and
- ✎ Queensland Heritage Register.

The National Trust of Australia (Queensland) firmly supports the adaptive reuse of heritage sites to ensure that they remain cared for and in use for future generations. However, the adaptive reuse must be compatible with the site's significance to ensure that it does not detrimentally affect the site's listed values.

We note that we have provided earlier submissions on this proposed development, as follows:

- ✎ 11 January 2018: Submission against the development (attached as Appendix A)
- ✎ 28 February 2018: Secondary submission with signed petition against the development (Appendix B).

Consultation

Following our earlier submissions, the project proponent (Parmac Property Group) has undergone extensive consultation with the National Trust of Australia (Queensland). The consultation involved the following:

- ✦ Initial meeting with National Trust CEO to review refined plans;
- ✦ Site inspection with Jane alexander and Glen Allen-Atkins from the National Trust to further review the refined plans and familiarise ourselves with the site;
- ✦ National Trust provided the proponent with detailed written advice on refined plans;
- ✦ Further meeting to review final draft of the new plans for Sinnamon Farm, with verbal advice given.
- ✦ Proponent courtesy notification to the National Trust alerting us to their new development application.

The National Trust of Australia (Queensland) has greatly appreciated the time and effort the development team has made since late February in keeping us informed, consulting us for input into the design and providing us with the opportunity to comment on the revised design before they made their Development Application (DA) to Brisbane City Council. We commend the genuine interest and attempt in the re-design process that appears to have sincerely sought to integrate our feedback and minimise the heritage impact of the proposed development.

Scale and Bulk

As stated in our original submission on the 11 January, 2018 (original submission attached as Appendix A), the National Trust of Australia (Queensland) firmly supports the adaptive reuse of heritage places when that reuse is designed in an appropriate and sympathetic manner. However, our submission recommended a re-design of the initial proposal to address issues of bulk, scale and overcrowding.

In particular, we were seeking a redesign which:

- ✦ Reduced the scale of the new building;
- ✦ Reduced the bulk of the new building; and
- ✦ Retained the original position of the farm building, where possible.

The new design has sought to address the issues raised by the National Trust of Australia (Queensland). We are sympathetic to the struggle the proponent has with the current location of the farmhouse and the operational requirements of the childcare facility.

Specifically, we note that the design revision has pulled the farmhouse back towards (though not completely back to) its original location. The new location ensures that:

- ✦ The farmhouse retains visual links with the other historic built elements on the site (the milk shed and mill race);
- ✦ The farmhouse is sited as close as possible to its original location;
- ✦ There is greater physical separation between the farmhouse and the new childcare facility;
- ✦ Use of transparent panels have been included to retain full visual appreciation of the farmhouse's external elevations;
- ✦ Open green space has been retained on either side of the farmhouse, creating a open landscape to both sides/elevations of the farmhouse;
- ✦ More sympathetic materials have been proposed for the new childcare facility; and
- ✦ The roofline of the new childcare facility has been lowered and does not protrude above the roofline of the farmhouse.

Trust commentary: These changes reflect a genuine attempt to balance the heritage considerations and earlier advice of the National Trust with the financial and operational needs of the childcare facility. They appear to have a much greater respect for the heritage values of the property and have mitigated many of the former adverse effects of the original proposal.

Issues Outstanding from Original Advice

We stress the importance in addressing the following recommendations (made in our original submission) when the full development application is made to BCC:

- ✦ The Impact Assessment should be reviewed to properly consider the level of adverse impact the proposed development will have on the site and outline the mitigation measures proposed to alleviate this impact

Trust Commentary: We note that the proponent has not updated the Impact Statement, however this has been alleviated via the provision of a detailed "Heritage Response"

- ✦ Address the recommendations and advice of Brisbane City Council and SARA in the Heritage Impact Statement or in the proposed development's design. We note the

frustration of the proponent when receiving conflicting heritage advice from the various consent authorities.

Trust Commentary: *We note that Heritage Response specifically addresses most of the requirements from BCC / SARA.*

- ✎ The Impact Assessment should include a schedule of significant elements for both buildings, in addition to a schedule of proposed works and a conservation methodology for works relating to significant fabric.

Trust Commentary: *We note that Heritage Response contains a Schedule of Significant Elements for interior and exterior elements, with a corresponding photographic log.*

- ✎ Includes an assessment of the significance and condition of the existing trees and provides justification for their removal.

Trust Commentary: *Some of the trees are retained in the new design however an arborists report has not been submitted. We understand that the trees are being removed for safety issues, as their species is inclined to drop limbs regularly.*

- ✎ Include a works specifications or a methodology for how conservation works should be carried out (including how the chimney will be retained and how works to the archaeological value of the mill will be managed during works and during the life of the childcare facility).

Trust Commentary: *We note the proponent has acknowledged is requesting that this can be prepared and submitted post-approval. We recommend that the preparation of this information be included as a consent condition.*

- ✎ Include thorough details, schedules of works and methodologies for work to the outbuildings other than stating that they will be repaired.

Trust Commentary: *We note the proponent has acknowledged is requesting that this can be prepared and submitted post-approval. We recommend that the preparation of this information be included as a consent condition.*

- ✎ Include details on what the “excellent interpretation opportunities for the local community” are and how they will be implemented and achieved.

Trust Commentary: We note the proponent has acknowledged is requesting that this can be prepared and submitted post-approval. We recommend that the preparation of this information be included as a consent condition.

Other recommendations:

- ✎ We recommend that an appropriately qualified and experienced archaeologist be consulted when works to the Mill Race are being designed and implemented. This should be a consent condition.

Discussion of Issues

We acknowledge that this proposal, including its revised design and response to earlier concerns over heritage, will still have an impact on the heritage significance of Sinnamon Farm, in particular on Avondale and its setting. The question of importance is whether the level of impact is now at an acceptable level and whether the mitigation measures proposed create enough benefit to balance any adverse impacts. It is accepted that Avondale currently in fair condition only and that this proposal will result in its restoration and guarantee its care for the foreseeable future. An unloved heritage building is an empty heritage building which is an outcome that should be avoided. In this instance, the repair and restoration of Avondale and its dairy, combined with a more sympathetic design for the new surrounding building, are an acceptable outcome for the site.

Thank you again for the opportunity to provide this submission. Please contact us should you have any further questions.

Yours sincerely,



Jane Alexander
Manager - Heritage Advocacy