Redland City Plan

Major Amendment Package 03/19 – Heritage Schedule

Public Consultation Report
March 2021



Shore Street East Precinct,c.1920s (RCC Library)

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This report has been prepared in accordance with Chapter 2, Part 4, Sections 18.3 and 18.4 of the Minister's Guidelines and Rules (MGR). Following Council's resolution made on 7 October 2020, the Strategic Planning Unit, in consultation with the Media Communications Unit, commenced public consultation on proposed major amendment to City Plan (03/19 – Heritage Schedule) on 12 October 2020 to 4 December 2020 (i.e. 54 days or 40 business days). The public consultation process was aligned to the notification, publication and submission process outlined by the *Queensland Heritage Act 1992* and the *Planning Act 2016*. In total, 37 public submissions were received.

The purpose of this report is to outline the grounds of submissions and detail how Council, in consultation with Australian Heritage Specialists (AHS) commissioned by Council as the heritage consultant, has considered and dealt with each submission. Note that the grounds raised in all submissions have been addressed in this report and for reporting purposes, submissions have been grouped into categories within Table 1, rather than reported on individually.

Table 2 responds to key issues included in the submissions that relate to individual sites proposed to be included in Schedule 7 – Heritage Schedule of City Plan and the content of the heritage citations.

Table 1 – Grounds of submissions and how Council has considered and dealt with each submission

Submission and grounds	Analysis / officer comments	Change(s) in response to submission(s) /recommendations
General comments in support of the proposed amendment A range of general comments in support of the proposed amendment were made, including the following points. • Listing will mean heritage value is not lost. • The heritage register plays an important role in preserving local heritage. • Preservation will enhance tourism. • The proposed amendment is supported provided it does not impede future use of the site.	• Support for the proposed major amendment is noted. • The purpose of the major amendment is to protect and enhance the distinctive character, identity and heritage of Redlands Coast for future generations. • Adopting the proposed amendment to preserve these locally significant buildings may result in intangible and economic benefits to the local community such as heritage tourism and community pride through their positive contribution to the character of the area. • The proposed major amendment will not affect how private properties are currently used. However, future development may be made assessable against City Plan, requiring a development permit to be obtained before development can occur. • The impact of development proposals on the heritage values of a site will be a key consideration in the assessment of a development application, guided by the principles of the heritage overlay code as part of City Plan. • Generally speaking, the provisions contained within City Plan will enable development to occur where the heritage values are maintained.	No changes required.
Comments relating to 6 Harris Street, Wellington Point A submission has been received in support of including 6 Harris Street, Wellington Point in the Local Heritage Register stating that the dwelling is mostly in its original condition and	• Support for the proposed inclusion of this property is noted.	No changes required.

providing addition historical context to its heritage value.		
Comments relating to 24 Queen Street, Cleveland and 228-234 Gordon Road Redland Bay A submission has been received from members of the congregation in support of the listing. It will ensure the heritage values, containing many years of history, will not be lost from either location.	• Support for the proposed inclusion of both properties is noted.	No changes required.
Objection to the process undertaken by Council General comments objecting to the public consultation process and the proposal in more general terms were received. The following points were made. • The landowner did not support Council nominating their property for inclusion on the Local Heritage Register. • No previous discussions were held with landowners before receipt of the letter. • Objection to Council passing personal details to a solicitor. • The properties aren't identified in the 'Queensland Heritage Act 2008 or 2014'. • A respondent indicated that they have found the proposed listing process stressful. • Council has no authority to list a private property.	• Council officers undertook the public consultation process in line with a communications strategy accepted by the Minister of the State Department of Development, Manufacturing, Infrastructure and Planning and the requirements contained in the *Planning Act 2016* (the PA), the Minister's Guidelines and Rules and the *Queensland Heritage Act 1992* (the QHA). • Communication activities completed included placing a notice in the Redland City Bulletin, on council's website and writing to each individual landowner impacted by the proposed major amendment. • On 12 October 2020, Council attempted to speak with all affected property owners by phone to advise them of the proposed amendment and notify them about the proceeding letter. • In addition to the letters sent in the mail, council officers hand-delivered a copy of the letter the day before the public consultation activities commenced. • Council did not pass private details of landowners to a solicitor. Council was unaware and of the letter sent by a local law firm to affected landowners. • The proposed major amendment seeks to include privately owned properties not listed elsewhere (state or federal heritage	The concerns around the public consultation process are noted and matters relating to the initial contact with affected community members will be considered as part of future planning schemes.

	register) into the Local Heritage Register (Schedule 7 of City Plan). • Under Part 11 of the QHA local governments have an obligation to keep a register of places of local heritage significance. Privately owned heritage places, including homes, contribute to Redland Coast's identity. It is Council's intention to provide statutory protection for these places through City Plan to ensure the heritage values are protected in perpetuity.	
General comments in support the public consultation exercise Support was received of the public consultation process with the following additional comments. • Would like the opportunity to contribute to the process in more detail. • Meetings with the heritage consultant and Council have been informative.	• All comments in support of the public consultation process have been noted. • Due to the complexities involved, Council commissioned Australian Heritage Specialists (AHS) to review places of European heritage of local significance. The public consultation process, undertaken according to the Minister's Guidelines and Rules, provided landowners and community members an opportunity to review the heritage citations and make a submission that would inform the decision-making process of Council regarding the proposed amendment.	Investigate options to include interested stakeholders, such as the National Trust, to participate in future bodies of work.
Objections to the public consultation process and availability of documents Comments have been received raising concerns about the availability of documentation for the general public. The following points have been made. • Why is the latest heritage assessment report unavailable? • Council has not been transparent. • Council / Australian Heritage Specialists have not provided information as requested.	• Over the years, Council has undertaken and commissioned several heritage studies that explore various factors and relevant historical themes that have influenced proposed amendment package 03/19. These studies include a thorough literature review and analysis to determine how properties were identified and prioritised for listing. • Council has made available heritage citations which list the primary and secondary references that support each listing. Many of the documents are publicly available and can be obtained from library and museum sources or through internet databases including https://trove.nla.gov.au. • The citations that relate to each property have been prepared by AHS, including a list of primary and secondary sources. These sources outline why each property is proposed to be entered into the heritage schedule.	No changes required.

	• Under section 42 of the QHA, the basis for making a submission against the listing must be made because the place does not satisfy the cultural heritage criteria included in the citations. • Council is committed to providing the community with open and transparent access to information concerning the proposed major amendment. General meetings can be closed to the public and documents can be retained as being confidential to enable Councillors to discuss matters of a commercial nature for which a public discussion would likely to prejudice the interests of the local government, as per s.254J of the *Local Government Regulation 2012.* • The latest heritage assessment report prepared by AHS dated 11 June 2017 has been uploaded to Council's Your Say page.	
Objection to the scope of the review Comments have been received questioning the scope of the heritage review and the list of the properties that have been included. The following comments were received. • What about the other properties on the list. • Why didn't Council consult the public on all properties that contain heritage values. • What about street trees that are within the protected area - these also need to be protected. • What about other properties that contribute to the street setting but haven't been listed. • Other similar aged property in the locality haven't been listed. • The choice of properties listed seems to be random.	• The objective of the Redlands European Heritage Review, administered by AHS, was to consider previous research and prepare a priority list of all places that contain significant local European heritage values across the city. • The study reviewed a master list of 354 properties and assessed them against best practice frameworks for the identification and assessment of heritage places in Australia, including the Burra Charter, the QHA and the Queensland Government Guidelines, *'Assessing Cultural Heritage Significance: Using the Cultural Heritage Criteria'*. • Upon completing the review, AHS identified 51 primarily privately owned places for priority inclusion in the Local Heritage Register. These places hold the strongest thresholds for Local Heritage value based on existing research and inspections and are included in this proposed major amendment package. • As a result of State Interest Review, completed in March 2019, the Department of State Development, Manufacturing, Infrastructure and Planning identified one property located on the State Heritage Register and one property within the Toondah Harbour Priority Development Area to be removed	Note trees and Dunwich Mining history nominated in submissions for future investigations.

• Why hasn't the mining history of Dunwich been considered, which represents the history of the community.	from the proposed amendment package. This reduced the number of properties on the list from 51 to 49. • Further to the 49 priority sites, AHS identified 66 properties on the master list that have been demolished, 45 properties that do not satisfy the listing thresholds, 46 properties already listed in the Local Heritage Register and 24 properties located on the State Heritage Register. These properties have been removed from the master list. • Additionally, 122 properties could not be thoroughly evaluated against the assessment criteria due to insufficient information or accessibility issues preventing a site assessment. Some of these sites may meet the assessment criteria following further research and inspections and they may form part of a future major amendment of City Plan. • The Heritage Schedule within City Plan features a range of place types including buildings, structures, built landscapes, trees and reserves. This proposed major amendment package aims to consider buildings and structures containing significant local European heritage values, not trees or sites that do not have European heritage connections such as the mining industry of Dunwich. • Due to the procedural requirements of administering a major amendment package, Council cannot include additional place types into the proposed amendment package. Council may consider including additional sites onto its Local Heritage Register as part of a future amendment to City Plan. • It is Council's responsibility, as owners, to care for street trees across the city including trimming, tidying or lopping the trees. Even though these trees are not included in City Plan, there are laws and regulations that offer street trees protection from harm.	

General comments on scope of proposed major amendment - Why only consider European heritage? Concerns are raised over the scope of the amendment package, particularly why the amendment package only considers European heritage. Questions were raised asking why the amendment package does not include environmental heritage, landscapes, views and objects. A suggestion was made that the citations should link back to indigenous culture where relevant.	• The Local Heritage Register is prepared in accordance with the QHA and the State Planning Policy and is intended to protect places that have heritage significance throughout Redlands Coast. • A listed place may include a building, structure or landscape. However, the scope of the proposed major amendment is to identify heritage places that demonstrate the evolution or pattern of the area's history relating to its European settlers. • Redlands Coast also has many significant Aboriginal sites. These places are managed under the *Aboriginal Cultural Heritage Act 2003* (ACHA). The Department of Aboriginal and Torres Strait Islander Partnerships maintain a cultural heritage database under the ACHA.	No changes necessary.
Comments to previous bodies of work A number of submissions made reference to previous bodies of work undertaken by Council and the length of time that has passed since Council first attempted to list private property on the Local Heritage Register. Comments included: • Council has been disinterested in heritage value in the past. • In 2002 Council advised that heritage listing on private property was voluntary only. • Landowners were advised in the past that their property won't be heritage listed. • Council has approved my property to be demolished three times in the past. • It has been a long time coming.	• Council has recognised and protected places of local heritage significance in public ownership for some time. Several heritage studies have been completed over the years to determine the nature and extent of Redland Coast's cultural heritage, and have outlined potential approaches to ensure these values are protected. • In 2002 Council determined that heritage controls on private property would only be voluntary. Consequently, no property owners volunteered for their properties to be listed on the local heritage register. • In 2003 Council introduced a heritage register as part of the Planning Scheme which included 49 State and Council owned / managed places. • Subsequent planning instruments continued to incorporate a Local Heritage Register, with additional properties added in 2010, 2012 and 2015. • In 2012 a heritage review was undertaken as a background study to the Draft Redland City Plan that assessed several sites in line with the assessment criteria established in the QHA. This	No changes necessary.

	study informed the commencement of the Redlands European Heritage Review. • City Plan Version 1 commenced in 2018 and listed 49 local heritage places in the Local Heritage Register. • The Redlands European Heritage Review study was completed in 2017. As part of this process a number of primarily privately owned properties were identified as being of local European heritage significance and recommended for inclusion in major amendment 03/19. • Council has an obligation to protect places of significant heritage value and the study that has been completed identifies priority sites that Council believes should be protected and included in the Local Heritage Register. This is despite the fact that past Councils may have chosen not to implement statutory protection for privately owned properties.	
Support for a Temporary Local Planning Instrument (TLPI) Concern has been expressed that Council should have placed a TLPI on the properties as soon as the list was released for public consultation.	• To date, Council has not considered pursuing a TLPI but instead has focussed on undertaking a significant public consultation exercise including providing opportunities for one on one consultation with each affected land owner. This was undertaken with a Council officer and Council's heritage expert in attendance. • If Council resolves to continue with the amendment following the completion of the public consultation process consideration may be given to a TLPI to provide interim statutory protection until the final steps in the amendment process are finalised.	No changes are necessary.
Comments in objection to irrelevance and time Concerns are raised about the time it has taken to protect these properties. The following points have been made. • Why has it taken so long.	• As detailed above (refer to 'comments to previous bodies of work' section of this report) several local heritage studies have been undertaken in the past, the content of which inform the Redlands European Heritage Review which commenced in 2016. • Delivering a major amendment to City Plan is a lengthy and often complicated process. The MGR provides the framework for undertaking a major amendment. Due to the complexities	No changes are necessary.

• Listing is too late and the heritage properties will be out of place as a result of surrounding development.	involved preparing this proposed major amendment, additional time has been allocated for the following reasons: o To enable the thorough completion of a detailed body of work to identify places across the city that identify local European heritage significance. o To ensure the historical content is accurate and satisfies the relevant assessment criteria. o To ensure that an appropriate budget is allocated to deliver a meaningful public consultation exercise and financial incentives package. • The proposed major amendment's objective is to include additional properties in the Local Heritage Register that demonstrate local heritage significance. • The heritage overlay code provides the criteria for assessable development and only relates to the properties identified in the Local Heritage Register, because of their local heritage significance. Properties that surround these places are not affected by the overlay. • Strict criterion is applied to establish whether a place is appropriate for entry into the Local Heritage Register. The criteria used to determine the heritage values that apply include the following: o If the place is important in demonstrating the evolution or patter of the local government areas history; o If the place demonstrates rate, uncommon or endangered aspects of the local government area cultural heritage; or o If the place has potential to yield information that will contribute to an understanding of the local government areas history. • Arguably, redevelopment surrounding a place identified in the Local Heritage Register may affect the sites physical setting; however, it would not affect the heritage values that apply to	

	the buildings themselves. The surrounding character does not justify removing properties listed or proposed to be included in the Local Heritage Register.	
Objections to listing privately owned property Concerns are raised that the identification of private property in the Local Heritage Register will have undesirable implications upon those private property owners. The following comments were made. • Listing will result in an increased cost for property maintenance. • A higher standard of maintenance will be required. • Not confident that the listing will not affect the ability to make basic changes to property without permission. • Additional planning approvals maybe required for minor work which will result in an additional cost burden. • Listing will affect rights of maintenance, renovation and development for property owners. • Heritage listing would be an imposition on the family. • Owners are faced with obligations but it is the community that will get the benefit.	• The concerns raised about the costs associated with maintaining a property that is listed in the heritage schedule are noted. • Under the provisions of the *Building Act 1975* (the BA), all private property is required to be maintained in a structurally sound and safe condition. Locally listed heritage property is no different. • Similarly to the BA, provisions in the QHA permit council officers to issue a repair and maintenance notice requiring work to be completed to protect the place from damage or deterioration caused by factors such as water, fire, vandalism or insects. • Generally speaking, heritage listing does not prevent changes, additions and alterations. However, the work must be completed to ensure that the local heritage values identified within the property citations are maintained and protected. • Owners will be able to undertake most routine maintenance works without requiring Council approval. With input from a heritage expert, following the potential adoption of a heritage incentives scheme, Council officers may provide general advice to assist with renovation and conservation of local heritage listed places (e.g. by confirming the extent of the heritage values and how the values can be managed and protected). • It is not disputed that a well presented heritage property will provide some community benefit through their positive contribution to the area's character. For this reason, Council is considering funding a heritage incentives scheme to ensure that the cost burden of maintaining the city's heritage is not borne solely by the impacted landowners. • Being listed in the Local Heritage Register will not compel a landowner to bring the heritage property to a higher standard of condition or undertake a higher standard of maintenance than	Prepare written guidance / factsheet that outline the types of routine maintenance work that may be undertaken without requiring a development permit from Council.

	would be the case for a property not proposed for inclusion on the local heritage register. • However, Council will be able to issue a repair and maintenance notice to landowners if they allow the property's condition to deteriorate to a state where the heritage values were threatened.	
Comments in objection to the identified local heritage values Claims have been made that some of the sites current condition affects the rationale for the property being included in the heritage schedule. The following points have been made. • The property is not in its original condition. • The exterior of the house does not resemble the original house. • The interior has been completely redesigned and rebuilt. • No internal inspections of the property have been completed. • There is no long term structural integrity. • Property is not unique. • Property demonstrates little architectural merit. • Have been advised in the past that building work previously carried out meant that it wouldn't be listed.	• The submissions received make specific reference to the current condition of a site and a belief that it no longer demonstrates local heritage value have been reviewed by a heritage professional. The responses are recorded in table 2.	For further information on any proposed changes refer to table 2.
Comments in objection to the place cards Claims have been made alleging that aspects of the property citation / place card are incorrect and should not form the basis for	• The submissions received that make specific reference to the criteria contained within individual property citations and explain a belief that the assessment is incorrect, have been reviewed by a heritage professional. The responses are recorded in table 2.	Editorial errors that have been identified will be changed. For any additional changes that are required, refer to table 2.

inclusion in the heritage schedule. The following points have been made. • Work undertaken to the property and in the surrounding area means the criteria no longer applies. • The property does not meet Criteria A as the property has changed substantially. • Property does not contribute to understanding of history. • Property does not demonstrate any historical cultural heritage. • The building does not provide new heritage to Redlands history. • The house was moved to this location. • Historical context within the citation contains some inaccuracies. • Claims made by RCC are flawed. • The building cannot be described as special. • The buildings would be better appreciated if they were relocated. • Relying on the citation would be ill-considered. • Property is not identified on maps and in books. • Citation is inaccurate and misleading. • Council has manipulated citation. • The property isn't unique. • Listing should only include key elements. • Listing should not consider intrusive and unsympathetic buildings.		

• Some of the citations include spelling errors.		
14 Stradbroke Place is not included on the list A comment was received noting that 14 Stradbroke Place is missing from the list of proposed properties although is in the document with detailed citations.	• Proposed site 73 has been identified as 2 Finnegan Street, Dunwich. This an alternative address for 14 Stradbroke Place, Dunwich which is a corner lot fronting Finnegan Street to the north and Stradbroke Place to the west. • The inconsistency between the list and the place card is an inadvertent error.	To improve clarity the Local Heritage Register and the place card will identify this site as 14 Stradbroke Place.
Comments relating to 15 John Street, Thorneside Comments were made stating that the dwelling at 15 John Street, Thorneside was demolished during the public consultation period and a question was raised asking why Council did not purchase the property. Comments have been made stating that are no historic houses left in the Thorneside area. Concerns were raised claiming that on one hand Council wants to list properties but on the other hand they allow them to be demolished.	• It is acknowledged that the dwelling at 15 John Street, Thorneside was relocated off site sometime between 17 September 2020 and 29 November 2020, possibly during the public consultation period. • Records reveal that a private building certifier approved a development permit for the removal of the dwelling in April 2020. • Under the current building and planning provisions, the private building certifier was lawfully permitted to approve the removal of the dwelling even though it was proposed to be included in the Local Heritage Register. • At the time of its removal, and until the proposed major amendment commences (unless a TLPI is in place), an approval is not required from Council to facilitate the removal. • The intent of the proposed major amendment is to recognise and protect important local heritage values. Once finalised, the major amendment to City Plan will ensure any proposal to demolish or remove property included in the Local Heritage Register will require a planning assessment to ensure local heritage values are protected. • Even though Council may seek to acquire private property for the purpose of heritage protection, this decision must be considered against other priorities and funding commitments. In this instance, Council did not compulsorily purchasing the land.	• Consider whether it is appropriate to place a TLPI on the remaining properties to protect them from demolition until the proposed major amendment has commenced. • As a consequence of the demolition of 15 John Street, it will be removed from the proposed amendment package.

	• Additional properties in Thorneside were considered as part of this study, including 200-204 Mooroondu Road. However, the investigations concluded that the properties did not meet the necessary criteria. • A member of the public may nominate additional sites located in Thorneside for inclusion in the Local Heritage Register. If it meets the assessment criteria, the Council may consider listing it as part of a future amendment to City Plan.	
Comments relating to Ward 13 at 8-22 Mallon Street, Dunwich Comments were made by the lessee of the 8-22 Mallon Street who hold a term lease with the State Government. Concerns have been raised that the end of lease requirements may undermine the intention of listing the site in the Local Heritage Register as the building will need to be removed / relocated off of the site manage contaminated soils likely to be present underneath.	• The proposal to list the site on the Local Heritage Register does not undermine or preclude the lessee from complying with any obligation required under their lease terms. • In the event that the site is added to the Local Heritage Register, the remediation work will need to be completed in accordance with an appropriate conservation management plan outlining the specific parameters. • As part of an potential future incentive package, council officers and a heritage consultant may provide tailored advice to the lessee on the site specific constraints and outline an appropriate strategy to comply with the obligations under City Plan and the lease.	No changes required.
Objections to proposed major amendment package on property values Property owners have raised a concern that the inclusion of their property in the Local Heritage Register will impact resale values, will make it difficult to sell and without the heritage listing their land value would increase in the future.	• Council does not intend to comment on the potential for the proposed heritage amendment to impact on the value of the properties, as property prices are influenced by a range of complex factors including, but not limited to: interest rates, consumer sentiment, population growth etc. Ultimately, property values are determined by what a prospective purchaser is willing to pay and conversely, the price a landowner is willing to accept. • In some instances, private property owners may have a right to apply for compensation. Refer to the 'comments supporting a compensation package' section of this report for further information.	No changes required.

Objections to proposed major amendment upon future development proposals Respondents have objected to the amendment on the grounds that it would impact current development rights. Submitters raised the following points. • The site is located within the medium density residential zone which indicates Council's desire to see this location more densely developed. • Under the current provisions, the site could be approved for multiple dwellings. • The medium density residential development nearby the site negates the importance of the place. • Redevelopment in accordance with the medium density residential zone would help to achieve housing targets. • Do not support privately owned property being stuck in a time warp whilst other property can be redeveloped with high-rise buildings. • Heritage listing over the whole site will restrict future development potential in line with the existing City Plan provisions. • The existing zoning undermines the historical significance of the property. • Listing the property on the Local Heritage Register is inconsistent with the future property development plan.	• Several sites proposed to be listed in the Local Heritage Register are located in zones identified in City Plan that support redevelopment at higher densities, for commercial or industrial uses. • The proposed amendment package affects 13 sites situated in the low – medium density residential zone or the medium density residential zone, six sites within the local, neighbourhood or district zones and one within the low impact industry zone. As a consequence of listing these sites in the Local Heritage Register, there may be instances where the listing will restrict the development potential indicated by the zone. • Ultimately, detailed investigations revealed that all the places identified as part of this proposed amendment package are of the highest priority for listing. The inclusion of these sites within these higher order zones does not in itself preclude their identification as a local heritage place. • The inclusion of the identified places in the Local Heritage Register does not limit a landowners ability to lodge a development application. • Through the development assessment process there may be an opportunity for an affected landowner to seek compensation if a development application is refused. Refer to 'comments supporting a compensation package' section of this report. • The proposed amendment package does not seek to restrict the development of places included in the heritage schedule, instead it intends to ensure that future development does not negatively affect the site's heritage values. • Heritage listing does not require owners to freeze a site in a time warp. Certain types of development, where deemed to be compatible with the heritage values of the site as part of the development assessment process, may still be approved by Council.	No changes required.

• Placement of the property on the register would remove opportunities to sell the property for redevelopment.		

Support for an incentive package
Comments received indicate that an adequately funded heritage incentive package would be necessary to help maintain property to the required standard.
The following incentives were identified by submitters.
• Rate relief is requested due to reduction in value.
• A heritage award program.
• The availability of a heritage consultant.
• A heritage advisory section at Council.
• Assistance with the preparation of plans and documents such as conservation plan and development applications.
• Full refund for professional fees.
• Zero fee for development application relating to heritage buildings
• Standard exemptions will need to be clearly clarified.
The following concerns were raised.
• At the time of public consultation there were no guarantees of assistance.
• There is no documented detail on the level of assistance.
• Properties would require large investment and the budget need to be expanded.
	• As a result of the General Meetings held on 23 January and 8 May 2019, it has been agreed in principle that a heritage incentive scheme will be considered prior to the commencement of the major amendment.
	• Council officers are investigating a range of potential financial and non-financial incentives that may be implemented to assist and support private property owners impacted by the amendment.
	• These measures will complement existing services already provided by Council including:
	  ○ Council's planning liaison officer service – a contact that is able to answer general enquiries relating to the City Plan and the requirements of the heritage overlay code; and
	  ○ the pre-lodgement meeting service, which enable prospective applicants to identify and resolve potential issues for a development proposal before lodging an application.
		Investigate a range of potential financial and non-financial incentives to assist private property owners affected by the proposed major amendment.

• There is no information advising when the incentives will be made available.		
Objection against the provision of an incentive package An objection was received questioning the fairness of an incentives package on the basis that tax payer's money should not be used to fund private property.	• Heritage incentives are anticipated to be considered as part of Council's annual budget for 2021-2022. • Council already offers rate concessions for private properties, reductions in development applications and community grants where a property or development proposal provides benefits to the broader community.	Ensure that any budget that may be allocated to support an agreed incentive package is provided in line with the principles of good governance.
Comments supporting a compensation package Some submitters advised that they would require compensation from Council if their property is included in the heritage schedule. The following points were made. • If property is listed Council can buy it or give significant compensation. • Compensation should be given to the full extent of the devaluation. • Council should purchase the property and if they don't they should stop interfering.	• In certain circumstances, Queensland planning legislation enables landowners to claim compensation from Council in response to an adverse planning change. An affected person may claim compensation if Council refuses to assess a development application under the superseded planning scheme. The timeframe for this entitlement is generally 12 months from the date the adverse change was made, in this instance, the date will be taken as the date the place is entered into the Local Heritage Register. • An extensive assessment is required to decide whether a property is eligible for compensation. The eligibility requirements are outlined in the provisions of the Queensland Heritage Act and the Planning Act. Assessment for a compensation claim will consider zoning provisions, location, current market conditions and features on the property. • The legislation does not provide mechanisms for compensation given to private properties simply because they are included in a Local Heritage Register.	No changes required.
Objections to public access Concerns are raised about the consequences of the listing specifically around public access, comments made are as followed. • Will not support public access into the property.	• As with all private property, local heritage listing does not allow the general public the right to enter private property, or require a property to remain accessible to the public. • The intention of the Local Heritage Register is to preserve local heritage value. It is not Council's intention to install a sign outside a private property listed in the heritage schedule.	No changes required

• Concerned that members of the public will enter property without permission. • Concerned that property will become a tourism draw card. • Object to people prying. • Do not support a heritage sign at the property as it could impact individual's privacy.		
Support installation of heritage sign A submitter supports the installation in front of their property, instead of the property being placed in the heritage schedule.	• The comments made have been noted. However, it is not Council's intention to install a heritage sign outside any of the private properties listed in the Local Heritage Register. It is merely intended to list the properties in schedule 7 of teh City Plan to appropriately recognise and protect the place's local heritage values.	No changes required
General comments supporting a heritage policy Comments have been received advising that Council would benefit from having a heritage policy.	• The proposed major amendment package has been prepared in line with the principles of the Corporate Plan 2026 and Beyond and the Operational Plan 2020 - 2021 which require an investigation into the available options to identify and protect places of local European heritage significance across the City. • The purpose of heritage overlay code, which forms part of the City Plan, is to protect the heritage values of the City's identified local heritage places and provides a reasonable policy approach to ensure that those places are not demolished, removed or altered in a way that removes or reduces their heritage values. • A more robust heritage policy framework may be considered as a future body of works, particularly if additional properties are added to the Local Heritage Register in the future.	No changes required.
General comment on the protection of heritage values A comment was made expressing that the community need to be advised that	• The physical location of a place forms part of the local heritage significance of all properties proposed to be included in the Local Heritage Register.	No changes to be made.

relocating buildings contain heritage values from their current setting devalues heritage.	• The overall purpose of the heritage overlay code is to ensure that the building or other valuable component of the building remains at its historical location. • Relocation of the whole building would have an adverse effect on the significance of a heritage place and will only be considered, as assessable development, if it is: 1) structurally unsound and is not reasonably capable of being made structurally sound; or 2) the change does not result in the loss of the particular heritage vales of the place.	
General comments relating to the effect of Toondah Harbour Concerns are raised that the Gipps Landing site has not been included in the Toondah Harbour PDA showing the scant attention that was applied to local heritage within the PDA and that the Toondah Harbour development will ruin the sense of place of Fernleigh and the Grandview Hotel.	• Council cannot include the Governor Gibbs landing site within its Local Heritage Register as the site is located within the declared Toondah Harbour Priority Development Area (PDA), administered by the State Government and outside the City Plan's jurisdiction. • The Grandview Hotel at 49 North Street, Cleveland was included on the Queensland Heritage Register in 1992. The Queensland Heritage Council reviews development proposals that involve a place on the Queensland Heritage Register. • The Toondah Harbour PDA development area boundary adjoins the site to the south. At this stage, no development approvals have been issued for the project. During the assessment of future applications, the effects of the development upon the surrounding area will be considered in accordance with the relevant planning instruments.	Council to contact Economic Development Queensland to pursue recognition of the Governor GIbbs landing site within the Toondah Harbour PDA Development Scheme.
Nomination of new local heritage places A number of additional places were nominated for inclusion in the heritage schedule. • Stone hut in Bayview Conservation Park. • Flying Boat maintenance ramps at Victoria Point. • Redland Bay swimming enclosure.	• The European Heritage Review did consider five (5) of the places that were nominated for inclusion into the Local Heritage Register (25 Arthur Street, 14-18 Harris Street, 20 Harris Street, Moonie 10-14 Edie Terrace, Wellington Point (39 Douro Road, Wellington Point) and 335 Bloomfield Street, Cleveland). These sites were identified as potentially thresholding but require further research and inspections to determine eligibility.	Note places nominated in submissions for future investigations and possible inclusion in the Local Heritage Register.

• Stone wall and stone gutter at 3 Main Road, Wellington Point. • 350 Boundary Road, Victoria Point. • 25 Arthur Street, Wellington Point. • 14- 18 Harris Street, Wellington Point. • 20 Harris Street, Wellington Point. • 3-7 Harris Street, Wellington Point. • 335 Bloomfield Street, Cleveland. • 5 Shore Street East, Cleveland. • 101 Birkdale Road, Birkdale. • Heinemann House at Mount Cotton. • Mount Cotton State School (Block A). • Lausanne 1-13 Beckworth Street, Ormiston. • Moonie 10-14 Edie Terrace, Wellington Point. (39 Douro Road, Wellington Point). • Features within Geoff Skinner Wetlands relating to Burnett's Tramway. • Trees outside 151 and 153 Shore Street North, Cleveland.	• Due to procedural requirements in administering a major amendment package, Council does not intend to include additional places into the proposed amendment package. These sites along with the other sites nominated may be added to the Local Heritage Register in the future. • 101 Birkdale Road, Birkdale is currently listed in the Local Heritage Register.	
General comments on the factsheets Comments have been received providing feedback on the contents of the factsheets. In particular it was noted that factsheet 1 and 2 are repetitive and could easily be merged into two.	• The fact sheets were designed to assist members of the public during the public consultation phase of the proposed amendment package. The fact sheets were written to be read in isolation of one another which accounts for the repetitiveness.	No changes are to be made to the factsheets at this time. However, as a future body of work, ensure that the factsheets prepared to support the proposed major amendment are concise and include relevant and appropriate information.
2-4 Cooinda Street, Wellington Point	• 2-4 Cooinda Street, Wellington Point is not affected by the proposed major amendment.	No changes required.

An objection was received during the public consultation process against multiple dwellings at 2-4 Cooinda Street. The objection did not provide any details in respect to the objections.	• Council's City Planning and Assessment branch is currently considering an impact assessable development application for the construction of 6 x multiple dwellings (application reference number MCU20/0069) over 2-4 Cooinda Street. • Further information on the application can be obtained via Council's PD Online application enquiry tool or from Council's Planning Assessment Unit.	

Table 2 – Grounds of submissions directly relating to the citation and how Council, with the assistance of AHS, has considered and dealt with each submission

Submission and grounds	Analysis / officer comments	Change(s) in response to submission(s) /recommendations

19 North Street, Cleveland
Including 19 North Street, Cleveland into the Local Heritage Register is not supported. It is claimed that extensive refurbishment has occurred on the property and the exterior of the house doesn't resemble the original house in anyway.
• Work completed includes the following.
  ○ The entire roof, outer walls and floors have been replaced.
  ○ The interior has been completely redesigned and rebuilt.
• A comment has been made claiming that the Heritage Council have previously confirmed that the property has no heritage value.
	• The condition of a place when purchased does not make it any less significant.
	• Extensions and alterations to a property does not imply that it has no heritage value.
	• Whilst changes to the roof, outer walls and floors may have occurred, the place is considered to easily threshold as a local heritage place, on the basis of the significance assessment provided within the original site card (that is, the place's heritage significance is retained at a local level for the reasons stated within the statement of significance).
	• The Queensland Heritage Council do not assess places of local significance.
		Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended proceed in accordance with the existing site card (58).

162 Shore Street North, Cleveland States that advice given in the past advised that the home would never be on register as it has steel girders and has been lifted.	• Although the property may have been altered and timber footings have been replaced with steel girders the place remains locally significant.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in

		accordance with the existing site card (68).
103 Passage Street, Cleveland The inclusion of this property in the Local Heritage Register is opposed. The submitter accepts that the property may have some appeal from the street but do not consider the property to be in an 'original' condition as it has been modified.	• Although the property may have had renovations and modifications over time, it generally retains the form and scale associated with an early 20th century bungalow which demonstrates a phase of development in Cleveland.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (69).
1 and 3 Shore Street East, Queensland • An objection to list 1 and 3 Shore Street East has been received. The submitter claims that these properties are not in a good condition, their long term viability is poor and ongoing maintenance to the property would be expensive. • The submitter further maintains that both properties demonstrate little internal or external architecture of merit and that neither property has an original frontage. • A comment has been made claiming that both properties have previously been identified as having 'nil significance' due to buildings being beyond being viably maintained. • The submitter claims that the properties do not meet Criteria A, B or C as the original streetscape no longer exists resulting in the properties no longer demonstrating historical context in their surroundings.	• The condition of a place does not imply that it has no heritage value. The overall integrity of the places was found to be 'good' noting that the form and scale of the buildings, their verandahs and roof forms are generally intact when compared with the historical photographs clearly representative of an important aspect of Cleveland's history during the second phase of development. • A qualified heritage practitioner and/or structural engineer would normally conduct an assessment of a place to establish whether the buildings are beyond being viably maintained. This has not been provided as supporting evidence. • Current overlays and zones within the planning scheme are not relevant to the heritage listing of 1 & 3 Shore Street East, Cleveland, including Criteria A. • The absence of other heritage buildings does not negate the heritage significance of 1 and 3 Shore Street. If anything, it further indicates the requirement to ensure that earlier structures such as these two residences are retained and conserved to illustrate that particular period of development in Cleveland's history. • Because many of the buildings no longer remain, the residences of 1 and 3 Shore Street provide one of the last indications of what the original streetscape would have looked like and aesthetic features of that streetscape. The former commercial	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (63 & 64).

	building and the neighbouring building are the remains of Cleveland's commercial core during the second phase of development from the 1880s until the 1930s focused along Shore Street East. Surviving examples of commercial buildings from this phase are now rare.	
18 Bingle Road, Dunwich • Listing this property into the Local Heritage Register is objected to on the following grounds. o The property does not satisfy Criteria A or C as it has been substantially changed since the period of asylum. o The property does not resemble the original shop front or drawings of the house. o The property does not contribute to the understanding of the history of asylum in Dunwich. o The building does not show any indication of ever being related to the benevolent society. o The building does not have the potential to contribute new knowledge about Redland's history.	• Alterations and modifications of places does not generally negate their heritage significance under Criteria A (historical value). • A review of Criteria C shows that the former asylum building clearly has the potential to contribute to an understanding of Redland's history, specifically relating to the asylum. This site, along with the other in-situ asylum houses are rare and the asylum itself was the first of its kind in Queensland. • No drawings of the house have been reviewed, noting that the dwelling has not been listed for its aesthetic values (Criteria E). • The shop front has not been classified as holding heritage value. It is the dwelling that has been considered as the primary heritage element for the listing and the Statement of Significance. • The building is largely unstudied and as such, it is considered that it is likely to provide a very high potential to contribute new knowledge about Redland's history, in particular the Benevolent Asylum.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (72).
14 Bingle Road, Dunwich An objection to include the site on the Local Heritage Register has been received on the following grounds. o No plan showing the house being in-situ during asylum era has been provided. o The house does not comply with Criteria A or C.	• Earliest aerial imagery is 1955 which clearly shows a structure in this location. • Criteria A and C on the site card were reviewed and have been found to be correctly drafted. o Criteria A: The house's pyramid roof and stepped roof over the front verandah are representative of the bungalow style houses of the late 1800s. These aesthetic qualities aid in demonstrating how society was evolving in this period. Furthermore, 14 Bingle road demonstrates the evolution	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (70).

	and pattern of Dunwich's history as a social connection to the Benevolent Asylum who had wide-ranging influence on the development of the area. o Criteria C: The building may, through its architectural design and layout, or through potential archaeology, reveal information about the daily life of the Benevolent Asylum, and therefore contributes to its history. Furthermore, the existence of the place remains as a symbol and tangible reminder of the services provided by the Benevolent Society.	
Redland Bay Hotel, 167 Esplanade, Redland Bay A submission has been made supporting the heritage significance of the site although identifying an opportunity for refinement reflective of its zoning and commercial catchment.	• It is considered a reasonable option that the entry is revised in accordance with the suggested reconfiguration of the local heritage boundary.	• Entry of the place onto the Schedule of Local Heritage Places is recommended to proceed – with revision to the proposed boundary (as attached) but otherwise in accordance with the existing site card (82). • Consider if there is any local significance attributed to the mature trees on the site and according to local tree protection requirements
17-18 Esplanade, Wellington Point • A submission has been received objecting to the listing as it will be an unnecessary burden upon the site where the building is not an original feature. • The submitter advises whilst it is preferred that the site is not identified	• Although not an original feature of the site, the building represents a Ferguson type B/R1 head teacher's residence which holds both social and architectural significance. Furthermore, its relocation in 1937 does not diminish the place's heritage value. • It is accepted that the artist studio and workshop is not an element of heritage significance. However, it is not usual for the	Entry of the place onto the Schedule of Local Heritage Places is recommended to proceed – with minor revision to the physical description and statement of significance (point 5 & 6), but otherwise

on the local heritage register, if it were to proceed then the citation is limited to the house and does not include recent additions. • The submission includes recommended amendments to the site card including to Criteria E.	heritage curtilage to be reduced to form an outline of part of a dwelling. This process ensures that the local heritage place is considered through a 'whole of site' approach. • The recommended amendments to the citation are supported removing the brick fireplace from the physical description as it appears to no longer exist (Google Maps Street View, 2021). • Disagree with the removal of timber fence and trees in the physical description. The physical description simply provides an overview of the current state of the house, and therefore these elements do no need to be removed. • Agree with the removal of text from Criteria E 'the place and its residential setting, the partially concealed views over the bay, and'.	in accordance with the existing site card (90).
157 Shore Street North, Cleveland • A submission supporting the inclusion of 157 Shore Street North has been received. However, a claim has been made that the site card contains some inaccuracies including the following. o Ownership history is inaccurate. o Physical description does not describe the building at 157. o Statement of significance describes the property as 'suburban timber cottage', submitter suggests this is inconsistent with statements under 'historical context' and 'Criteria A' which describe the building as a boarding house. • Additional comments have been received requesting that the small building at the front of the site is excluded from the heritage listing and	• The Deed of Grant was reviewed at the time of preparing the citation and this along with the ownership history is understood to be correct. • It appears that the physical description has been incorrectly added from 151 Shore Street North and will be remedied. • The citation will be updated to reflect the boarding house descriptor. Further the Physical Description will be updated to include reference to the cistern. • The store is part of the complex and should be included in the listing. It has been reported to potentially be associated with Fogherty's Store and may in itself be of local significance.	Entry of the place onto the Schedule of Local Heritage Places is recommended to proceed – with minor revision to the citation but otherwise in accordance with the existing site card (67).

that at the southern end of the house a still functional cistern should be included in the listing.		
18 Oxley Parade, Dunwich • Objection to the identification of 18 Oxley Parade in the Local Heritage Register has been received claiming that information contained on the site card is incorrect. The following points have been made. o There are no records of the site in any maps, plans or photographs in either the Benevolent Asylum or within the township of Dunwich, during 1825 to 1946. o The statement of significance relies on the period of architecture for the site rather than its historical context. o The house was never a wardsmens cottage in the Benevolent Asylum. o The listing relies on personal recollection.	• The level of information regarding the Asylum and the relocation of dwellings immediately after the closure is difficult to quantify in an 'exacting manner'. However, this does not necessarily mean the building is not connected with the Asylum. • It is highly likely (if not almost certain) that reference to the building being associated with the Benevolent Society is accurate. • It is not possible to corroborate the verbal comments relied on to inform the background studies of the European Heritage Review in this instance. • At this time, it is recommended that the place is not entered on the Local Heritage Register until such time as the historical background can be properly quantified.	Entry of the place onto the Schedule of Local Heritage Places is recommended not to proceed – with further investigations to take place if Council pursues the listing of an additional tranche of properties.
24 Queen Street, Cleveland • An objection has been made to the proposed listing of the church and the church hall as detailed below. Church • The submitter objects to the listing on the basis that Criteria A, D and G of the guideline 'Carrying out a heritage survey' produced by the Department of Environment and Heritage Protection	Church • The assessment's has been completed in accordance with the QHA criteria as well as the 'Carrying out a heritage survey' guideline. • In response to the submitter's view that the church does not satisfy Criteria A the following points are made. o The place clearly demonstrates the evolution or pattern of history in the Redlands. The history is both site specific and is also thematically based in a City-wide context. The place	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (61 and 62).

are not satisfied. • The church does not satisfy Criteria A on the following grounds. o The church was relocated to the site in around 1980 thereby breaking any connection and importance it may have had with its historical origins. o Any Methodist church in Redlands could be considered a representative of the Methodist community. o The current use of the church as an office shows it does not demonstrate any pattern or evolution of the development of the Redlands area. o The church is not demonstrative of anything important about the life or work of the congregation who utilised it, nor is it relevant to any cultural significant work of the congregation. • The church does not satisfy Criteria D on the following grounds. o The church is not important in demonstrating the principal characteristics' of any particular cultural places. Particularly as the church has been relocated, altered and repaired over the last 40 years. o The church lacks architectural expression or aesthetic significance. o The church is not an important or	is found to be locally significant as historically important from the second phase of development of the Cleveland district, whereby the construction of the Methodist Church and the formation of the parish on the site was an important event. This significance is evidenced further by the continued use of the site by the congregation in an unbroken period since the first church was constructed until today. o The original church was not relocated to the site in approximately 1980 as claimed. It was simply repositioned within the site. Further, it is readily identifiable as the original church building within the site. Further, the second church remains in use and demonstrates the continuation of Methodist (Uniting) practice on the site. The two structures clearly represent one history on the site, and this is not in a broken or unassembled format which would detrimentally impact the listing of the place as a local heritage place under this criterion. o The claim by the Submitter that 'It is the case that any Methodist church in Redlands could be considered "representative" of the Methodist community..' is accepted. However the tangible link of the Methodist Church within the context of Redland City's history is important to the greater area's history. o The claim that the current use of the church as an office 'disrupts' the pattern or evolution of the development of the Redlands area is confusing, as there is clearly a continued pattern or evolution on the site through the growth of the parish in the 1970s and the need for a new church. The conversion of the old church to an office is entirely relevant. o Similarly, the claim that the 1979 building currently used to accommodate the congregation does not represent the	

significant example of a Methodist church architecturally or through its historical use. o The church is not important or significant to its current location or to the greater Redlands region. • The church does not satisfy Criteria G on the following grounds. o While associated with the Methodists the association with the church cannot be described as 'strong' or 'special'. o The fact the building was relocated to make way for the new church confirms that the community does not have any particular or special attachment to it. • The proposed listing is inconsistent with the future aspiration of the church community. • The listing is adverse to the interests of the community. <u>Church hall</u> • The church hall does not satisfy Criteria A for the reasons below. o It does not demonstrate the evolution or pattern of history in the Redlands. o The church hall is an important component of the complex buildings as opposed to the Redlands area generally.	Methodist community in the Redlands is unclear. The second church on the site represents the life or work of the congregation who utilised it, and is therefore relevant to the work of the congregation. • In response to the submitter's view that the church does not satisfy Criteria D the following points are made. o The church complex is important in demonstrating the principal characteristics of a particular cultural place for the reasons outlined in the citation. o The claim by the submitter that the church lacks architectural expression or aesthetic significance is not applicable to Criterion D. Architectural or aesthetic qualities, including the additions and modifications, are captured under Criterion E, which has not been utilised for this entry. o The comments made by the submitter do not appropriately address the site card's significance statement showing why the listing should not proceed. • In response to the Submitter's view that the church does not satisfy Criteria G the following points are made. o The Submitter claims that while the place is associated with the Methodists', the association with the church cannot be described as 'strong' or 'special'. o We note that the threshold for entry at a local level suggests in itself that the place's association with the 'Methodists' must reach a local 'indicator' for 'Cleveland' or 'Redlands' to qualify for local heritage significance. The Church has a long association with the Methodist Church (now the Uniting Church) and as such, the former church is of social significance to Redlands." – as per Criterion G of the site card (citation). o The fact the building was relocated is neither relevant nor not relevant under this criterion. If the building was demolished at the time, it could be concluded as such.	

o The church hall does not demonstrate anything important about the life or work of the congregation who utilised it, nor is it relevant to any culturally significant work of the congregation. o The church hall is not historically noteworthy. • The church hall does not satisfy Criteria D on the following grounds. o It is not important in demonstrating the principal characteristics of a particular class of cultural places important to the region. o The church hall has ordinary, unadorned features, lacking aesthetic significance. • The church hall does not satisfy Criteria G on the following grounds: o The association the Methodist and Uniting Church community have and had with the church hall cannot be described as 'strong' or 'special'. • The listing is adverse to the interests of the community. • The church hall would be better appreciated by being relocated to a site where it can be used, for example, as a community hall.	<u>Church hall</u> • The comments made by the submitter in relation to the proposed listing of the church hall and that claim that it does not satisfy Criteria A, D or G has been generally duplicated for the church. As such, reference should be made to the above responses. • However, the additional comments are made in response to the calm that the church hall would be better appreciate by being relocated and used, for example as a community hall. The relocation of heritage places is generally the last option that should be considered by any proposal and generally results in poor outcomes for the community and end user.	
<u>228 – 234 Gordon Road, Redland Bay</u> • An objection has been made claiming that the church does not exhibit cultural heritage significance, as defined by the	• The assessment of the site has been carefully completed following the provisions of the QHA using highly qualified personnel who have substantial experience in the assessment and management of local heritage places across Australia.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to

QHA, and should not be listed in the Local Heritage Register. • The submitter claims that the church does not satisfy Criteria A or G on the following grounds. o The church has been substantially altered and extended over the years. o The church does not sufficiently demonstrate the life or work of the congregation who utilised it, nor is it relevant to any culturally significant work of the congregation. o The current buildings no longer tell the story which demonstrates the pattern of Redlands area history. o The church is not historically noteworthy and is not important in demonstrating the evolution or pattern of history in Redlands. o While associated with the Methodists, the association with the church cannot be described as 'strong' or 'special'. o Although the church has been in use for a significant amount of time, the connection it has with the Methodist or Uniting Church community, is not distinguishable from any other church. o The church has been subject to extensive alteration over the years detracting from its heritage aesthetic and historic value.	• The alterations and extensions that have been completed over the years have not detrimentally affected the place to the point that it does not threshold for local entry. • In response to the submitter's claim that the church does not satisfy Criteria A the following points are made. o The place clearly demonstrates the life or work of the congregation who utilised it, and is relevant to this criteria, in particular within the 1885 church, which survives on the site. o The removal of buildings and substantial alterations have not detrimentally affected the place to the point that it does not threshold for local entry. o An inspection of the original 1885 Church was completed during the public consultation stage which enabled a more thorough assessment of the place. It is very clear that the original building remains in sound order (albeit built around) and as such, the former church is of historical significance to Redlands and very clearly thresholds as a locally significance building. • In response to the Submitter's view that the church does not satisfy Criteria G the following points are made. o The Submitter claims that while the place is associated with the Methodists', the association with the church cannot be described as 'strong' or 'special'. o It is note that the threshold for entry at a local level suggests in itself that the place's association with the 'Methodists' must reach a local 'indicator' for 'Cleveland' or 'Redlands' to qualify for local heritage significance. The 'Church has a long association with the Methodist Church and as such, the former church is of social significance to Redlands – as per Criterion G of the site card (citation).	proceed in accordance with the existing site card (83).

35 Fernbourne Road, Wellington Point • An objection against the listing of the place has been received. The following points have been made. o The property is not reflective of the classifications. o The heritage component is a small footprint of the overall property. o Significant changes have been made to the building since the 1980's.	• The submitter has not identified any reasons why the site does threshold as a local heritage place and that Council's citation does not form an appropriate framework for the listing of the place on the Schedule of Local Heritage Places. • Alterations and extensions to a property does not imply that it has no heritage value and the place is considered to easily threshold as a local heritage place as described in the site card.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (91).
219 Middle Street, Cleveland • Object to the proposed listing – the heritage citation is inadequate, inaccurate and incomplete. Reliance on the citation would be inappropriate. • The condition of the property is not 'very good' as described in the citation, and it is not 'an intact example of a traditional suburban dwelling'. • A number of alterations and additions have been made to the dwelling.	• The submitter has not identified any reasons why the site does threshold as a local heritage place. The site card has been reviewed and found to be correctly drafted. • Alterations and modifications to a property does not imply that it has no heritage value and the place is considered to easily threshold as a local heritage place as described in the site card.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (57).
16 Bingle Road, Dunwich • A submission has been made objecting to the place being included in the Local Heritage Register. The following points have been made. o The listing will negatively impact the current use of the property. o The zoning undermines the historical significance of the property. o The Benevolent society is well documented in the museum.	• The heritage listing of the place does not impact the current use of the place as a residence. • The place falls under the Neighbourhood Centre Zone Code allows a limited range of businesses, services, and facilities in order to meet the basic, day to day needs of the community in the immediate vicinity. One of the aims of this zone code is to ensure that development avoids increasing adverse impacts on the residential amenity of the surrounding neighbourhood. The heritage listing would also ensure that any development on the place will be managed against the specific benchmarks for assessment under City Plan. The purpose of the Heritage Schedule is to protect the heritage values of identified local	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed in accordance with the existing site card (71).

	heritage places.	
33 Thorne Road, Wellington Point (St George Anglican Church • A submission has been received which includes a number of suggested amendments to the site card. • The submitter objects to the inclusion in the local heritage schedule on the following grounds. o Continued use is not a sufficient reason for inclusion of the site on the Local Heritage Register. o Timing of the building is not considered sufficient to warrant inclusion on the heritage register. o Failing attendance has resulted in associated falling revenue and the church is already under financial pressure to maintain the existing buildings. o The church is showing signs of detrition of timber elements and brickwork. o The church has been substantially altered including the vestry added in 1956 and a ramp in 2002.	• The site card will be amended to reflect the historic information provided in the submission. • The strong and special cultural and spiritual associations the place has with the local community, particularly the association with the Randall's who bequeathed the land and also the Anglican demographic, is demonstrated through its survival and continued use. • The building demonstrates the pattern of development of Birkdale and the demand for religious practices at the time of its construction through both its use and aesthetic merits. • One must simply look at the variety of adaptive re-use and restoration projects that occur daily that balance both heritage and contemporary use together, to understand that a heritage listing does not mean that an owner is totally restrained from progressing forward. Listing on the heritage register does not prevent change, it simply regulates it. • Alterations and change do not imply that the place has no heritage value. Alterations and change may be necessary for the continued maintenance, safety, compliance, and use of a heritage place and its facilities. Changes can be sympathetic to the heritage values of the building or be reversible in nature. In this case, the building has very good integrity with original fabric that remains largely intact despite extensions and additions. • The heritage listing captures the setting (land) as well as the church building as per Article 8 of the Burra Charter. However, it is agreed that the Church Hall and Rectory (manse) buildings have no local heritage value and any applications to alter or change the fabric of these buildings should generally be approved without heritage restrictions where they do not impact elements or features of heritage significance on the site.	Entry of the place 'as is' onto the Schedule of Local Heritage Places is recommended to proceed with minor revision to the citation but otherwise in accordance with the existing site card (54).
17-19 Station Street, Wellington Point (St James Anglican Church)	• Evidence indicates that St James Church was formerly known as St Georges Church of England in Redland Bay (previously	Entry of the place 'as is' onto the Schedule of Local Heritage

• A submission has been made against the inclusion of the place in the local heritage schedule on the following grounds. o The church was formerly St Pauls Church at Redland Bay. o The church hall is the former Hollywood Theatre previously located in Greenslopes. o Two stained glass memorial windows designed by William Bustard were added after WW2. o The design and style of the building, materials used and construction techniques are not unique. o Timing of the building is not considered sufficient to warrant inclusion on the heritage register. o Continued use is not sufficient for inclusion of the site on the heritage register. o Inclusion of the site on the heritage register will seriously affect the parish's ability to carry out necessary changes. o Failing attendance has resulted in associated falling revenue and the church is already under financial pressure to maintain the existing buildings. o The church is showing signs of detrition particularly the flooring timbers in the church porch and	located in Peel Street) and that the church hall is the hall building which was previously next to the Hollywood Theatre in Greenslopes. • William Bustard was one of the most prolific artists and stained-glaziers in Brisbane, who was well known for his stained glass work which has been included in lighthouses, prominent residences, churches and cathedrals, and public and commercial buildings (arguably, this aspect could be considered significant under Criterion H in the future). • Although the church has been modified over time (stuccoed), at the time of construction, the Victorian style building consisted of a steeply pitched gable roof and single-skin timber walls with an externally exposed frame. It was designed by John H Buckeridge during the early period of his role as Diocesan Architect for the Anglican Diocese of Brisbane. • The building demonstrates the pattern of development of Redland Bay and the spread of religious practices at the time of its construction through both its use and aesthetic merits. • The strong and special cultural and spiritual associations the place has with the local community is demonstrated through its survival and continued use. • Alterations and change do not imply that the place has no heritage value. Alterations and change may be necessary for the continued maintenance, safety, compliance, and use of a heritage place and its facilities. Changes can be sympathetic to the heritage values of the building or be reversible in nature. In this case, the original fabric remains despite past alterations. • The heritage listing captures the setting (land) as well as the church building as per Article 8 of the Burra Charter. The land was donated by James Willard, an important figure in the development of Wellington Point. However, it is agreed that the hall has no local heritage value and any applications to alter or change the fabric of the hall should generally be approved	Places is recommended to proceed in accordance with the existing site card (99).

vestry. o The church has been substantially altered. • The submitter requests that, if the site is listed, that the heritage curtilage be restricted to only include the church building and not the hall.	without heritage restrictions where they do not impact elements or features of heritage significance.	